

St. Louis City (HW)
Lincoln, A Pentair Company

MO Dept. of Natural Resources
Hazardous Waste Program
Jefferson City, MO

675
1/17/02
How BNF



Bob Holden, Governor • Stephen M. Mahfood, Director

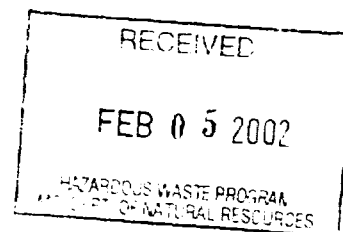
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

St. Louis Regional Office
9200 Watson Road, Suite 201
(314) 301-7600
FAX (314) 301-7607

January 17, 2002

Ms. Monica Stegman
Lincoln, A Pentair Company
One Lincoln Way
St. Louis, MO 63120



Dear Ms. Stegman:

This office has received a copy of your November 28, 2001 and December 27, 2001, facility responses to Notice of Violation (NOV) # 5001 and Letter of Warning (LOW) # 02-SL.007. A review of the responses indicates your facility has corrected the unsatisfactory features noted during the October 15, 2001, hazardous waste inspection.

No further response is required by you concerning the NOV and LOW at this time. Thank you for your cooperation in this matter.

Sincerely,

ST. LOUIS REGIONAL OFFICE

Rochelle Gibson
Environmental Specialist

RG/ka

c: Kathy Flippin, Hazardous Waste Program



2025884

Site: St. Louis Ordnance Plant
ID: MO82100224645
Break: 11.11

JAN - 8 2002



December 27, 2001

Ms. Rochelle Gibson
Missouri Department of Natural Resources
Environmental Specialist
9200 Watson Road
Suite 201
St. Louis, MO 63126

RE: Notice of Violation 5001

Dear Rochelle:

Per our telephone conversation of the 19th of December 2001, your request for further detail regarding the disposition of stored waste at our facility as listed on the supplied list titled, "Industrial and Commercial Ecology" is as follows:

As we discussed, the list was only a reference and used internally as an estimate of stored material to establish costs associated with consolidation, labeling and shipping that would be coordinated by the consultants from Industrial and Commercial Ecology. As we prepared for final identification and disposition, we determined that the original estimate was far less due to drums being partially full or empty. Initially, access to certain drums was limited due to double stacking.

1. As a result, the following actions occurred:
 - a. All mineral spirits/containers were identified, consolidated, labeled and shipped per all RCRA and DOT regulations. The result was identified by manifest #00178, which was previously supplied. The manifest was filled out in accordance with RCRA and DOT shipping requirements, with the shipping name of 'Waste Flammable Liquids'. Section J of the manifest further identifies the material as "Mineral Spirits".
 - b. All used oil was consolidated and managed as per Company internal "Used Oil Program":

ISO 9001
Registered

- c. All containers of grease with the exception of 4, 55gal drums were identified and processed to a beneficial reuse recipient. The remaining 4 will be processed in the same manner.
- d. Identified ISOCYANATE containers were managed as non-hazardous waste, as per the manufacturer. Residual material was combined to produce a dry foam byproduct, which was disposed of as non-hazardous.

If any additional information is needed, please contact me at (314) 679-4335.

Sincerely,

A handwritten signature in black ink, appearing to read 'Monica Stegman', with a stylized, flowing script.

Monica Stegman
Safety and Services Supervisor

Cc: R. Carroll, TTEMI



MISSOURI DEPARTMENT OF NATURAL RESOURCES
TELEPHONE OR CONFERENCE RECORD

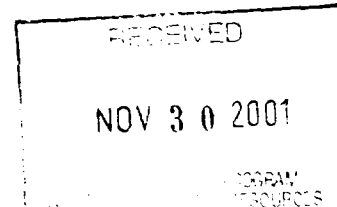
FILE <u>Lincoln</u>		DATE <u>Dec. 3, 2001</u>	
TELEPHONE ▶	<input type="checkbox"/> INCOMING <input checked="" type="checkbox"/> OUTGOING	CONFERENCE ▶	<input type="checkbox"/> FIELD <input checked="" type="checkbox"/> OFFICE
SUBJECT <u>Response to L&W.</u>			
PERSONS INVOLVED			
NAME		REPRESENTATIVE	
<u>Albert Adams</u>		<u>Lincoln</u>	
<u>Rachelle Gibson</u>		<u>MDNR</u>	
SUMMARY OF CONVERSATION			
<p><u>Told Mr Adams response to L&W did not address disposal</u> <u>of all wastes observed in ^{the} storage area during Oct 15, 2001</u> <u>inspection. Mr Adams stated isocyanate components</u> <u>were combined and disposed of as special wastes.</u> <u>Pumpable oil waste was pumped into facilities waste oil</u> <u>tank. Some greases were able to be reused.</u> <u>I asked Mr Adams to ^{provide} written response to address all</u> <u>wastes stored at the time of the inspection.</u></p>			
ACTION TAKEN			
FINAL RESULTS			
SIGNATURE <u>Rachelle Gibson</u>		DATE <u>12-3-01</u>	

Not ENF
Lincoln, A Pentair Co
St Louis, MO

Albert W. Adams, Jr.
Vice President
Human Resources

LINCOLN
INDUSTRIAL

November 28, 2001



Ms. Kathy Flippin
Hazardous Waste Program
Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102

Dear Ms. Flippin:

RE: Letter of Warning (LOW) 02-SL.007

Attached are the documents to address the LOW dated November 19, 2001. Two actions and responses were required to address violations. The Company responses and documents of required actions are as follows:

1. Provide a copy of the manifest(s) to indicate hazardous wastes stored beyond 90-days have been shipped to an authorized Treatment, Storage and Disposal Facility (TSD).

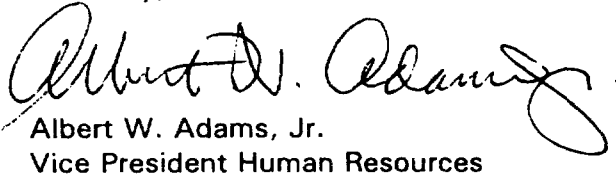
Enclosed is a copy of Hazardous Waste Manifest No. 178, dated October 25 for the shipment of the subject hazardous wastes.

2. Provide Documentation to indicate paint waste stored in satellite accumulation greater than one year has been shipped to an authorized TSD.

Enclosed is a copy of Hazardous Waste Manifest No. 179, dated November 27 for the shipment of the subject paint waste to an authorized TSD.

If any additional information is needed please contact me at (314) 679-4250 or Monica Stegman at (314) 679-4335.

Sincerely,


Albert W. Adams, Jr.
Vice President Human Resources

cc: Rochelle Gibson
Monica Stegman

ISO 9001
Registered

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

Hazardous Waste Program

P.O. Box 176 Jefferson City, Missouri 65102

573-751-3176

HAZARDOUS WASTE MANIFEST

THIS DOCUMENT MUST BE USED FOR ALL MISSOURI-DESTINED SHIPMENTS. INSTRUCTIONS FOR THE COMPLETION OF THIS FORM ARE ON A SEPARATE SHEET.

EMERGENCY
RESPONSE
1-800-424-8802

U.S. COAST GUARD
1-800-424-8802

CHIEF OF POLICE
1-800-424-8802

DEPT. OF NATURAL
RESOURCES
573-751-3176

Please print or type (Form designed for use on elite (12-pitch) typewriter)

Form Approved OMB No 2050-0039

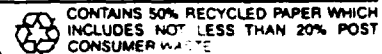
UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MISSOURI 0000000000	Manifest Document No. 0000000000	2. Page 1 of 1	3. Information in the shaded areas is required by State law.
3. Generator's Name and Mailing Address 0530 Lincoln Industrial One Lincoln Way St. Louis, MO 63120					
4. Generator's Phone (314) 674-4123		6. US EPA ID Number			
5. Transporter 1 Company Name Schuler Truck Company, Inc.		8. US EPA ID Number			
7. Transporter 2 Company Name		10. US EPA ID Number			
9. Designated Facility Name and Site Address Pollution Control Industries 5485 Fay-Fox Drive Memphis TN 38117		10. US EPA ID Number			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, ID Number and Packing Group (if any))		12. Containers Number	Type	13. Total Quantity	14. Unit Wt/Vol.
a. Waste of hazardous liquids, non A UN3092, PG III, RD (11111)		1	DRUM	0.0335	G
b.					
c.					
d.					
15. Special Handling Instructions and Additional Information Emergency Response: 811-222-61 314 674-4123		16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford.			
Printed/Typed Name M. J. STEPHENS		Signature [Signature]		Month Day Year 11 03 2001	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name [Name]		Signature [Signature]		Month Day Year 11 03 2001	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year NOV 30 2001	
19. Discrepancy Indication Space					
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name [Name]					
Signature [Signature]					
Month Day Year					



GENERATOR COPY - PART 6

IMPORTANT

SEE INSTRUCTIONS SHOULD PART 1 & 2 FAIL TO RETURN WITHIN 35 DAYS.



RECEIVED

NOV 30 2001

Hazardous Waste Program
Ministry of Natural Resources

POLLUTION CONTROL INDUSTRIES, INC.

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Page _____ of _____

Generator Name/Location _____

EPA ID Number Lincoln Industrial Manifest Number 00179Waste Analysis Available: MOD006269385 No On file at facility 00179

PROFILE # a	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA b	RCRA WASTE CODES (List all that apply) c	SUBCATEGORY (See Table II and Select Key # if applicable) d	TREATABILITY GROUP Please check the applicable treatability group		REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005 List all applicable constituents from key below g	UNDERLYING HAZARDOUS CONSTITUENTS FOR D001*, D002, D003*, D004, D043 List all applicable constituents from Table I h
				Non-wastewater >1% TOC & > 1% TSS e	Wastewater f		
226757 LF		D001	1	X			
x 226795 LF	X						

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005, (for Column g)

- | | | | |
|----------------------------------|-----------------------------------|----------------------------|---|
| 5) Acetone | 12) Cresylic Acid | 19) Methanol | 26) Toluene |
| 6) Benzene | 13) Cyclohexanone | 20) Methylene Chloride | 27) 1,1,1 Trichloroethane |
| 7) N-Butyl Alcohol | 14) 1,2-Dichlorobenzene | 21) Methyl Ethyl Ketone | 28) 1,1,2 Trichloroethane |
| 8) Carbon Disulfide | 15) Ethyl Acetate | 22) Methyl Isobutyl Ketone | 29) 1,1,2 Trichloro 1,2,2 Trifluoroethane |
| 9) Carbon Tetrachloride | 16) Ethyl Benzene | 23) Nitrobenzene | 30) Trichloroethylene |
| 10) Chlorobenzene | 17) Ethyl Ether | 24) Pyridine | 31) Trichlorofluoromethane |
| 11) Cresols (o, m, or p isomers) | 18) Isobutanol (Isobutyl alcohol) | 25) Tetrachloroethylene | 32) Xylene (Total) |

I certify under penalty of law that the above information is accurate and true.

Signature

Print Name

MONICA M. STEGMAN

Date

11-27-01

S. (111)
Lincoln, a Pentair Company

MO Dept. of Natural Resources
Hazardous Waste Program
Jefferson City, MO

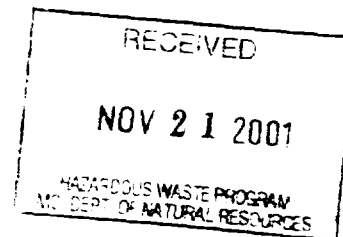
HW End

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Bob Holden, Governor • Stephen M. Mahfood, Director

DIVISION OF ENVIRONMENTAL QUALITY

St. Louis Regional Office
9200 Watson Road, Suite 201
(314) 301-7600
FAX (314) 301-7607



November 19, 2001

Mr. Albert Adams
Lincoln, a Pentair Company
One Lincoln Way
St. Louis, MO 63120

Dear Mr. Adams:

Letter of Warning (LOW) 02-SL.007

This office has received your facility's November 8, 2001 response to Notice of Violation (NOV) #5001. This NOV was issued as a result of violations noted during an October 15, 2001, hazardous waste management inspection. A review of the facility's response indicates two violations still require your attention.

The following actions and responses are required to address the violations:

1. Provide a copy of the manifest(s) to indicate hazardous wastes stored beyond 90-days have been shipped to an authorized Treatment, Storage, and Disposal Facility (TSD).
2. Provide documentation to indicate paint waste stored in satellite accumulation greater than one year has been shipped to an authorized TSD.

Enclosed is a report of the hazardous waste compliance inspection conducted by Ms. Rochelle Gibson of the St. Louis Regional Office staff. Please note that the section titled "UNSATISFACTORY FEATURES" lists violations noted during the inspection and outlines steps to correct the violations. The inspector has also made additional comments in the "COMMENT" section of the report.

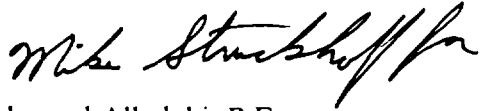
The violations described above must be addressed in a response from Lincoln by December 19, 2001. The facility's response and all supporting documentation must be sent to this office with a copy of the entire response forwarded to Ms. Kathy Flippin, Hazardous Waste Program, Department of Natural Resources, P.O. Box 176, Jefferson City, Missouri 65102

Lincoln, A Pentair Company (HW)
November 16, 2001
Page 2

Should you have any questions regarding this letter or the report, please contact Rochelle Gibson at 314-301-7600.

Sincerely,

ST. LOUIS REGIONAL OFFICE

A handwritten signature in black ink, appearing to read "Mohamad Alhalabi".

Mohamad Alhalabi, P.E.
Regional Director

MA/RG/jh

Handwritten initials, possibly "jt" or "jh", in black ink.

Enclosures

c: Kathy Flippin, Hazardous Waste Program

MISSOURI HAZARDOUS WASTE MANAGEMENT LAW
COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY

Lincoln, A Pentair Co.
One Lincoln Way
St. Louis, Missouri 63120
(314) 679-4335

EPA ID#: MOD006269385
MO Generator ID#: 001105

PARTICIPANTS

Department of Natural Resources

Ms. Rochelle Gibson
Environmental Specialist
St. Louis Regional Office

Lincoln, Pentair Co.

Ms. Monica Stegman
Plant Safety & Services Supervisor

Mr. Albert Adams, Jr.
Vice President, Human Resources

INTRODUCTION

A hazardous waste compliance evaluation inspection was conducted at Lincoln, A Pentair Company (Lincoln) on October 15, 2001. The purpose of the inspection was to assess compliance with regulations pursuant to the Resource Conservation and Recovery Act (RCRA) and the Missouri Hazardous Waste Management Law. The scope of the inspection was confined to aspects of facility operations pertaining to hazardous waste management. The inspection was conducted under the authority granted to the Department by Sections 260.375(9) and 260.377 RSMo.

Notice of Violation (NOV) #5001 was issued by certified mail on October 22, 2001, for violations noted during the inspection.

FACILITY DESCRIPTION

Lincoln is a designer and manufacturer of lubrication and fluid pumping systems. Over 3000 products are manufactured for a variety of industrial customers. The facility includes general offices, production, assembly, and distribution warehouse. Manufacturing processes include tool and die work, heat treating, a tumbling operation, and painting. The facility has been at its present location since about 1920. The facility operates one full shift and two partial shifts, Monday through Friday, and has approximately 400 employees.

The facility is registered with the United States Environmental Protection Agency (USEPA) and with the Missouri Department of Natural Resources (MDNR) as a large quantity generator of hazardous waste and was inspected as such.

Lincoln receives bar stock (aluminum, brass or steel) and castings that are machined into desired components. Bar stock and castings go through multiple tooling operations and may go through secondary operations including heat-treating, tumbling, and painting. The facility formerly operated a plating process. An outside vendor now performs this process and in-house processes have been removed. Finished components are assembled and warehoused.

Hazardous wastes are generated from solvent degreasing of parts and from the painting operation. Several containers holding 3 –5 gallons of mineral spirits are located in the screw machine area for degreasing of parts. When the solvent becomes unusable the containers are emptied into a 55-gallon satellite accumulation container located at the south end of the area. According to one of the employees in the area, the satellite accumulation container is filled about every two weeks. When full, the drum is moved to the waste storage area. The satellite accumulation container was not marked nor dated at the time of inspection.

The facility operates one paint booth for painting of parts. According to the paint booth operator, solvent is sprayed through the paint lines into fabric booth filters to clean the paint lines and spray gun. Excess paint and solvent is accumulated in a 55-gallon accumulation container. The operator stated only a small amount of waste was generated and that the accumulation container had been there approximately 1 ½-years and was about 1/3 full. The container was not marked nor dated. Fabric filters from the spray booth are changed as needed and disposed of dry with sanitary waste. According to the material safety data sheet for the cleaning solvent, methylpyrrolidone, it does not contain an F-listed hazardous waste.

The hazardous waste storage area was located in the southeast corner of the steelyard. Most containers in hazardous waste storage were not visibly marked with any identifying contents and were not dated. Adequate isle space was not available and a containment system was not in place. By observation and an inventory taken by the facility, the area contained the following items:

- Ten full 55-gallon drums of waste mineral spirits;
- Eight 55-gallon drums of isocyanate component, a foam reagent no longer usable, each drum estimated to be 1/8 full;
- Twelve 55-gallon drums of oil and/or mineral spirits estimated to be 1/4 full;
- Eight 55-gallon drums and several 5-gallon buckets containing a variety of oils and greases most used for product testing.

According to Ms. Stegman, the former Plant Safety & Services Supervisor left the position in May 2001 and she began the position in September 2001. To her knowledge and facility records, no waste has been shipped since March 2001. Ms. Stegman has contracted with Industrial & Commercial Ecology (ICE) to characterize and dispose of the existing waste in storage. This is currently scheduled for the end of October 2001.

The facility also operates an aqueous part washing machine. This machine is changed/cleaned once or twice per month and discharged to Metropolitan Sewer District.

Lincoln routinely generates the following waste streams:

1. Waste mineral spirits, used for degreasing, D001, generation rate 110 gallons per month, disposed of at Onyx Environmental Services, Menomonee Falls, Wisconsin.
2. Waste paint material, D001, generation rate 55 gallons every six months, disposed of at Onyx Environmental Services, Menomonee Falls, Wisconsin.
3. Used greases and oils from product testing, previous generation, and generation rate undetermined.
4. Used cutting oils from various tooling machines, generation rate 1800 gallons per month, disposed of at Superior Solvents, St. Louis, Missouri.
5. Fluorescent lamps, managed as Universal Waste, disposed of at Chemical Waste Management, Emelle, Alabama.

The following attachments are included:

1. Inspection Record and Checklist
2. Inventory of wastes located in hazardous waste storage area
3. Process flow diagram
4. Material Safety Data Sheet for paint solvent
5. Generator's Summary Report, 3/31/01
6. Facility layout diagrams
7. Photos taken during inspection
8. Facility brochure

UNSATISFACTORY FEATURES

1. **Storage of hazardous waste exceeds 90-day storage limit, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a).** At the time of the inspection, none of the wastes stored in the hazardous waste storage area were marked with a beginning date of accumulation or a storage date. However, one of the employees in the area stated the isocyanate component wastes had been in the storage area since April 2001. Ms. Stegman stated that no wastes had been shipped since March 2001. Lincoln must immediately ship stored hazardous wastes to a Treatment, Storage, and Disposal Facility (TSD). Provide a copy of the manifest(s) with the facility's response to indicate these wastes were shipped to an authorized TSD.
2. **Failure to have a containment system for a hazardous waste storage area holding more than 1000 Kg of liquid hazardous waste, in violation of 10 CSR 25-5.262(2)(C)2.D.(I).** At the time of the inspection, the facility was storing greater than 1000 Kg of liquid hazardous waste in an area with no containment system. A description of the wastes stored is included in the "Facility Description" section of the

report. The facility must either construct an appropriate containment system for storing more than 1000 Kg of liquid hazardous waste or must ship the stored waste to a TSD immediately and certify in writing that the facility will no longer store more than 1000 Kg of liquid hazardous waste.

3. **Containers of hazardous waste not marked with the words "Hazardous Waste", in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(3).** At the time of the inspection, containers of waste mineral spirits and waste isocyanate component were located in the hazardous waste storage area. None of the containers were observed to be marked with the words "Hazardous Waste". The facility must certify that the containers have been marked and all future containers storing hazardous waste will be so marked.
4. **Containers of hazardous waste not marked and labeled during the entire on-site storage period, in violation of 10 CSR 25-5.262(2)(C)1.** All stored hazardous waste must be in compliance with Department of Transportation (DOT) requirements during the entire on-site storage period. The containers of waste mineral spirits and waste isocyanate component located in the hazardous waste storage area were not marked nor labeled with the required information. The facility must properly mark and label each drum and certify that containers storing hazardous waste in the future will be marked and labeled.
5. **Beginning date of accumulation not marked on containers of hazardous waste, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(2).** The beginning date of accumulation was not marked on any of the containers of waste mineral spirits and isocyanate component located in the hazardous waste storage area. The facility must mark all containers of hazardous waste with the beginning date of accumulation. This serves to ensure that containers do not remain in storage past the allowable time period. Certify that storage containers of hazardous waste have been dated and all future containers of hazardous waste will be marked with the beginning date of accumulation.
6. **Adequate aisle space was not available, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.35.** The facility did not have adequate aisle space available in the hazardous waste storage area. Markings and labels could not be observed and drums could not be observed for leaks. Adequate aisle space must be available in order to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment. Certify that adequate aisle space has been made available and that aisle space will be maintained in the future.
7. **"No Smoking" signs were not conspicuously placed by ignitable wastes, in violation of 10 CSR 25-5.262(2)(C)2.F(II).** The facility must place "No Smoking" signs near areas where ignitable wastes are located. Certify that signs have been placed in all areas storing ignitable wastes.

8. **Satellite accumulation container of hazardous waste not marked identifying contents and beginning date of accumulation, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34 (c)(1)(ii) as amended by 10 CSR 25-5.262(2)(C)3.** One 55-gallon drum of paint related waste, located in the paint area, and one 55-gallon drum of waste mineral spirits located in the screw machine area, were not marked with identifying contents nor the beginning date of accumulation. Satellite accumulation containers of hazardous waste must be marked either with the words "Hazardous Waste" or with words identifying the contents and the beginning date of accumulation. Certify that all containers of hazardous waste have been properly marked and dated and will be properly marked and dated in the future.
9. **Hazardous waste stored in satellite accumulation area greater than one year, in violation of 10 CSR 25-5.262(2)(C)3.** According to the paint booth operator, one 55-gallon drum of paint related waste had been accumulating waste for approximately 1 ½-years. The facility must remove and ship to a TSD the current accumulation of waste paint and certify that future accumulations will not be stored in the satellite accumulation area greater than one year. Provide documentation to indicate the waste paint has been shipped to an authorized TSD.
10. **Manifest did not have consecutive shipment number, in violation of 10 CSR 25-5.262(2)(B)2.A.** Of the manifests observed during the inspection, one manifest had a shipment number repeated. The facility must certify that future shipment numbers will be consecutive.
11. **Manifest summary reports not submitted to the Department quarterly, in violation of 10 CSR 25-5.262(2)(D)1.B. and 10 CSR 25-5.262(2)(D)1.E.** According to the facility's records the facility had not submitted a manifest report for the period 6/30/01. Facilities that are registered as a large quantity generator of hazardous waste and have more than one shipment of hazardous waste per year are required to submit manifest reports quarterly. If only one shipment of hazardous waste is made per year the facility may submit an annual report. Lincoln must submit a quarterly report for period 4/1/01 – 6/30/01. A quarterly report for the period 7/1/01 – 9/30/01 must be submitted by November 14, 2001.
12. **Contingency plan did not include a list of spill control equipment, including description, location and capabilities, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34 (a)(4) referencing 40 CFR 265.52(e).** The facility must include a list of available spill control equipment and include a description, the location and the capabilities of the equipment in the contingency plan. Submit a copy of this listing with the facility's written response.
13. **Containers and aboveground tank storing used oil not marked "Used Oil", in violation of 10 CSR 25-11.279(1) incorporating 40 CFR 279.22 (c)(1).** The facility's containers of used oil were marked "waste oil". No marking was observed on the facility's aboveground used oil storage tank. Used oil intended to be recycled must be marked with the words "Used Oil". Lincoln must certify that its containers and tank have been marked "Used Oil".

COMMENTS

The facility must update the contact person/position, telephone number, and county information registered with the Department. This may be done by submitting a Notification of Regulated Waste Activity Form to the address indicated on the form.

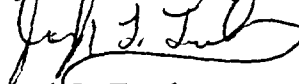
If the facility maintains a hazardous waste generation rate less than 1000 Kg (2200 lbs.) per month it may update its registration to a small quantity generator. Small quantity generators of hazardous waste may store their waste up to 180 days. However, if the accumulated amount exceeds 1000 Kg the facility must meet the requirements of having a containment system for storing liquid hazardous waste, must have a personnel training plan, and a contingency plan.

Report Prepared By:



Rochelle Gibson
Environmental Specialist
St. Louis Regional Office

Report Reviewed By:



Joseph L. Trunko
Hazardous Waste Unit Chief
St. Louis Regional Office

JT/RG/jh



MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM
LARGE QUANTITY GENERATOR
INSPECTION RECORD AND CHECKLIST

L
LQG-INSP

FOR FACILITIES THAT GENERATE/ACCUMULATE > 1000 Kg (2,200 lbs. or approximately 5 drums)

NAME <u>Lincoln, A. Pentar Co.</u>		DATE <u>10/15/01</u>	EPA ID NUMBER <u>MO000029335</u>
ADDRESS <u>One Lincoln Way</u>		RR NO <u>—</u>	MO ID NUMBER <u>00105</u>
CITY <u>St. Louis 63120</u>	COUNTY <u>St. Louis City</u>	# OF EMPLOYEES <u>400</u>	YEARS AT SITE <u>Since 1920</u>
FACILITY REPRESENTATIVE(S), TITLE(S) <u>Monica Stegman, Services Supervisor</u> <u>Albert Adams, VP Human Resources</u>		TELEPHONE NUMBER <u>314-679-4335</u>	
DATE(S) OF LAST INSPECTION(S) <u>4/95, 5/89</u>			
LATITUDE <u>N DEG 38' MIN 41' SEC 13.6"</u>		LONGITUDE <u>W DEG 90' MIN 16' SEC 3.3"</u>	

DESCRIPTION OF THE FACILITY'S OPERATIONS AND PLANT

See report

WASTE STREAMS

DESCRIBE EACH WASTE STREAM GENERATED INCLUDING THE PRODUCTION PROCESS	GENERATION RATE	EPA WASTE CODE(S)	DISPOSITION
1. Waste flammable liquid - Mineral spirits; degreasing	110 gallons per month	D001	Onyx Env, Wisc.
2. Waste paint related - Paint booth wastes	55 gallons every 6 months	D001	Onyx Env, Wisc.
3. Waste grease + oils - product testing	Undetermined	Non-Haz	undetermined
4. Used oil - cutting oils	~1500 gal. per month	Non-Haz	Superior Solvents, St. Louis
5. Fluorescent lamps	Universal waste		Chem. waste, Alabama

A. GENERAL			COMMENTS
1. <input checked="" type="checkbox"/> Registered as a hazardous waste generator - Section 260.380.1 (1) RSMo and 10 CSR 25-5.262 (2)(A).	1	GGR	
2. <input checked="" type="checkbox"/> Facility determines if waste is hazardous - 10 CSR 25-5.262(1) incorporating 40 CR 262.11.	1	GGR	
3. <input checked="" type="checkbox"/> Utilizes a licensed hazardous waste transporter - Section 260.380.1(5) RSMo.	1	GGR	
4. <input checked="" type="checkbox"/> Utilizes authorized HW TSD or RR facility - Section 260.380.1(7) RSMo.	1	GGR	
5. <input checked="" type="checkbox"/> Facility does not operate as a TSD - Section 260.390(1) RSMo.	1	GGR	

PART 1: WALK-THROUGH INSPECTION

[illegible]

			COMMENTS
1. <input checked="" type="checkbox"/> Storage does not exceed 90 days or 180/270 days if facility generates < 1000 Kg/month - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a).	1	GPT	
2. <input checked="" type="checkbox"/> Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.171.	1	GPT	
3. <input checked="" type="checkbox"/> Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.172.	1	GPT	
4. <input checked="" type="checkbox"/> Containers closed in storage - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.173(a).	1	GPT	
5. <input checked="" type="checkbox"/> Containers storing incompatible waste separated or protected from each other by a dike, berm or wall - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.177(c).	1	GPT	
6. <input checked="" type="checkbox"/> Container storage areas have a containment system if holding more than 1000 Kg of liquid hazardous waste - 10 CSR 25-5.262(2)(C)2.D(I).	1	GOR	No containment
7. <input checked="" type="checkbox"/> Base of containment system is impervious and free of cracks or gaps - 10 CSR 25-5.262(2)(C)2.D(III)(a).	2	GOR	
8. <input checked="" type="checkbox"/> Containers protected from contact with accumulated liquids - 10 CSR 25-5.262(2)(C)2.D(III)(b).	2	GOR	
9. <input checked="" type="checkbox"/> Capacity of containment system = 10% of waste volume or volume of largest container, whichever is greater - 10 CSR 25-5.262(2)(C)2.D(III)(c).	2	GOR	
10. <input checked="" type="checkbox"/> Run-on onto the containment system is prevented or excess capacity is provided - 10 CSR 25-5.262(2)(C)2.D(III)(d).	2	GOR	
11. <input checked="" type="checkbox"/> Accumulated liquids removed to prevent overflow of containment - 10 CSR 25-5.262(2)(C)2.D(III)(e).	2	GOR	
12. <input checked="" type="checkbox"/> Containers of ignitable or reactive waste stored 50 ft. from property line (or meet requirements) - 10 CSR 25-5.262(2)(C)6 referencing 40 CFR 265.176 as amended by 10 CSR 25-7.265(2)(I)7 and 8.	2	GPT	8 drums isocyanate component + 10 drums (55-gallon) waste mineral spirits not marked, not labeled, not dated
13. <input checked="" type="checkbox"/> Containers clearly marked "Hazardous Waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(3).	2	GPT	
14. <input checked="" type="checkbox"/> Waste packaged/labeled/marked per DOT during entire on-site storage period - 10 CSR 25-5.262(2)(C)1.	2	GPT	
15. <input checked="" type="checkbox"/> Date of accumulation marked on containers - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(2).	2	GPT	
16. <input checked="" type="checkbox"/> Facility inspected and maintained (weekly) - 10 CSR 25-5.262(2)(C)2.C(I) and (II) referencing 40 CFR 265.174.	2	GPT	
17. <input checked="" type="checkbox"/> Daily inspection of areas subject to spills, i.e., waste handling areas - 10 CSR 25-5.262(2)(C)2.C(II) referencing 40 CFR 265.195.	2	GOR	
18. <input checked="" type="checkbox"/> Adequate aisle space is available - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.35.	2	GPT	Not available
19. <input checked="" type="checkbox"/> Placards available for transporter - 10 CSR 25-5.262(1) incorporating 40 CFR 262.33.	2	GPT	
20. <input checked="" type="checkbox"/> "No Smoking" signs conspicuously placed by ignitable or reactive wastes - 10 CSR 25-5.262(2)(C)2.F(II).	2	GOR	Not posted

[illegible]

1. <input checked="" type="checkbox"/> Containers kept closed - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.173(a).	1	GPT	COMMENTS
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2. <input checked="" type="checkbox"/> Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.171.	1	GPT	COMMENTS
3. <input checked="" type="checkbox"/> Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.172.	1	GPT	
4. <input checked="" type="checkbox"/> Quantities accumulated not exceeding 55 gal. (1 quart of acutely-hazardous wastes) - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1).	1	GPT	
5. <input checked="" type="checkbox"/> Satellite containers go to storage within 3 days of filling - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(2).	1	GPT	
6. <input checked="" type="checkbox"/> Container marked identifying contents and beginning date - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(ii) as amended by 10 CSR 25-5.262(2)(C)3.	2	GOR	
7. <input checked="" type="checkbox"/> Stored in satellite areas less than 1 year - 10 CSR 25-5.262(2)(C)3.	2	GOR	

screw machines - mineral spirits
Painting

D. PREPAREDNESS AND PREVENTION AND EMERGENCY PROCEDURES

1. <input checked="" type="checkbox"/> Facility operated and maintained to minimize the possibility of an emergency - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.31.	1	GPT	COMMENTS
2. <input checked="" type="checkbox"/> Adequate and proper spill control, decontamination and safety equipment available (fire blankets, respirators, SCBA, absorbents, etc.) 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.32 as amended by 10 CSR 25-5.262(2)(C)2.G.	2	GPT	
3. <input checked="" type="checkbox"/> Adequate water supply and fire control equipment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.32(c) & (d).	2	GPT	
4. <input checked="" type="checkbox"/> Device in the hazardous waste operation area capable of summoning emergency assistance - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.34(a).	2	GPT	
5. <input checked="" type="checkbox"/> Telephone or two-way radio on-site and capable of summoning local fire or police department - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.32(b).	2	GPT	
6. <input checked="" type="checkbox"/> Communication and emergency equipment tested and maintained - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.33.	2	GPT	

E. LQG TANKS

TANK DESIGNATION	CONTENTS	CAPACITY	CONTAINMENT	AGE
1. NA				
2.				
3.				
4.				
5.				

1. <input checked="" type="checkbox"/> Spill prevention controls in place and operating e.g. check valves, dry discount couplings - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(b)(1).	1	GPT	COMMENTS
2. <input checked="" type="checkbox"/> Overfill prevention controls in place and operating e.g. high level alarms, automatic feed cutoff, etc. - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(b)(2).	1	GPT	
3. <input checked="" type="checkbox"/> Sufficient freeboard in uncovered tanks to prevent overtopping - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(b)(3).	1	GPT	
4. <input checked="" type="checkbox"/> Waste or treatment method compatible with tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(a).	1	GPT	
5. <input checked="" type="checkbox"/> Incompatible wastes not placed in same tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.199(a).	1	GPT	
6. <input checked="" type="checkbox"/> Ignitable or reactive wastes rendered safe/protected from sources of ignition or reaction - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.198(a)(1) and (2).	1	GPT	
7. <input checked="" type="checkbox"/> Ignitable or reactive wastes treated/stored in accordance with NFPA's buffer zone requirements - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.198(b).	1	GPT	

8. <input checked="" type="checkbox"/>	Volatiles with vapor pressure > 78 mm @ 25° C not placed in open tanks - 10 CSR 25-5.262(2)(C)2.F.(I).	1	GOR	COMMENTS
9. <input type="checkbox"/>	Wastes and residues removed as hazardous waste and tank and equipment decontaminated upon closure - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.197(a).	1	GPT	
10. <input type="checkbox"/>	Secondary containment system provided for tanks and equipment; installed after July 14, 1986; storing dioxin waste; over 15 years old; of unknown age in facility over 15 years old; repaired, replaced or reinstalled after July 14, 1986 - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(a).	1	GPT	
11. <input type="checkbox"/>	Secondary containment system constructed of or lined with waste compatible material of sufficient strength and thickness - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(1).	2	GPT	
12. <input type="checkbox"/>	Containment system supported by base capable of preventing failure due to settlement, compression or uplift - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(2).	2	GPT	
13. <input type="checkbox"/>	Containment system provided with a leak detection system capable of detecting a release within 24 hours - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(3).	2	GPT	
14. <input type="checkbox"/>	Containment system sloped or designed to drain and remove liquids - 10 CSR 25-5.262(2)(C)2.E referencing 10 CSR 25-5.262(2)(C)2.D (III)(b).	2	GOR	
15. <input type="checkbox"/>	Containment system capable of containing 100% of the capacity of the largest tank - 10 CSR 25-5.262(2)(C)2.E referencing 10 CSR 25-5.262(2)(C)2.D (III)(c).	2	GOR	
16. <input type="checkbox"/>	Containment system free of cracks or gaps - 10 CSR 25-5.262(2)(C)2.E referencing 10 CSR 25-5.262(2)(C)2.D (III)(a).	2	GOR	
17. <input type="checkbox"/>	Run-on onto containment system prevented or excess capacity is provided - 10 CSR 25-5.262(2)(C)2.E referencing 10 CSR 25-5.262(2)(C)2.D (III)(d).	2	GOR	
18. <input type="checkbox"/>	Spilled or leaked waste and precipitation removed from secondary containment within 24 hours or as soon as possible - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(4).	2	GPT	
19. <input type="checkbox"/>	Tanks are clearly labeled or marked "Hazardous Waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(3).	2	GPT	
20. <input type="checkbox"/>	Daily inspections of overfill/spill control equipment, aboveground portions of tank system, secondary containment, and data gathered from monitoring equipment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.195(a).	2	GPT	
21. <input type="checkbox"/>	Inspection log maintained - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.195(c).	2	GPT	
22. <input type="checkbox"/>	Cathodic protection systems inspected annually, impressed current sources every two months - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.195(b).	2	GPT	
23. <input type="checkbox"/>	Detailed written assessment by an independent, qualified, professional engineer for tanks installed after July 14, 1986, prepared and on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.192.	2	GPT	
24. <input type="checkbox"/>	Written assessment by an independent, qualified, professional engineer prepared and on-site for tanks lacking secondary containment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.191.	2	GPT	
25. <input type="checkbox"/>	Leak test, internal inspection or tank integrity exam performed annually and documented, by an independent, qualified, professional engineer for tanks lacking secondary containment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(i).	2	GPT	
26. <input type="checkbox"/>	Leak/spill response resulted in: waste flow stopped immediately; waste removal; containment and removal of visible releases to the environment; notification and report; and repair or closure - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.196.	2	GPT	

PART 2: RECORDS INSPECTION

F. MANIFESTS

			COMMENTS
1. <input checked="" type="checkbox"/> Facility uses manifest system - 260.380.1(6) RSMo and 10 CSR 25-5.262(2)(B).	1	GMR	# 171 repeated
2. <input type="checkbox"/> Records maintained for a 3-year period - 10 CSR 25-5.262(1) incorporating 40 CFR 262.40(a).	2	GRR	
3. <input checked="" type="checkbox"/> Generator's MO & EPA I.D. Numbers - 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(a) as amended by 10 CSR 25-5.262(2)(B)1.	2	GOR	
4. <input checked="" type="checkbox"/> Manifest document ID and consecutive shipment numbers - 10 CSR 25-5.262(2)(B)2.A.	2	GOR	
5. <input checked="" type="checkbox"/> Generator's name, address and phone number - 10 CSR 25-5.262(2)(B)1.	2	GMR	
6. <input checked="" type="checkbox"/> All transporters' names, phone numbers, MO & EPA I.D. #'s, license plate # - 10 CSR 25-5.262(2)(B)1 and 2.	2	GMR	
7. <input checked="" type="checkbox"/> Designated facility name, address, phone, MO & EPA I.D. #, - 10 CSR 25-5.262(2)(B)1 and 2.	2	GMR	
8. <input checked="" type="checkbox"/> DOT shipping name, Hazard Class and waste I.D. # (RQ - if required) - 10 CSR 25-5.262(2)(B)1 and 2.	2	GMR	
9. <input checked="" type="checkbox"/> Containers, quantity and specific gravity designated - 10 CSR 25-5.262(2)(B)1 and 2.	2	GMR	
10. <input checked="" type="checkbox"/> Manifest signed and dated - 10 CSR 25-5.262(2)(B)1.	2	GMR	
11. <input checked="" type="checkbox"/> Out of state manifests have all required MO information - 10 CSR 25-5.262(2)(B)4.A.	2	GOR	
12. <input checked="" type="checkbox"/> Manifest continuation sheets are not used - 10 CSR 25-5.262(2)(B)1.	2	GOR	
13. <input checked="" type="checkbox"/> Manifest returned within 35 days - or exception report submitted within 45 days - 10 CSR 25-5.262(2)(D)2.C.	2	GRR	
14. <input checked="" type="checkbox"/> Manifest summary reports and manifest sent to DNR quarterly OR annually if one or no shipments are made - 10 CSR 25-5.262(2)(D)1.B. and 10 CSR 25-5.262(2)(D)1.E.	2	GOR	

not submitted
for 6/30/01; 9/30/01

G. LAND DISPOSAL RESTRICTIONS

			COMMENTS
1. <input checked="" type="checkbox"/> Tests waste or uses knowledge of waste to determine if the waste is restricted from land disposal - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a).	1	GLB	
2. <input checked="" type="checkbox"/> Dilution of waste to meet LDR treatment standards is not occurring - 10 CSR 25-7.268(1) incorporating 40 CFR 268.3(a).	1	GLB	
3. <input checked="" type="checkbox"/> Notification/certification includes correct EPA Hazardous Waste number, corresponding treatment standards, manifest number, and waste analysis data - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(b) (4) and (5).	2	GLB	

H. PERSONNEL TRAINING

			COMMENTS
1. <input checked="" type="checkbox"/> Personnel are trained to respond to emergencies including the use of alarm systems, emergency equipment and contingency plan - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(a)(3).	2	GPT	40 Hr in Nov. Haz Comm in Oct. Maintenance manager has 40 hr.
2. <input checked="" type="checkbox"/> Employees do not work in unsupervised positions until they have completed the training - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(b).	2	GPT	
3. <input checked="" type="checkbox"/> Training reviewed annually - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(c).	2	GPT	
4. <input checked="" type="checkbox"/> Program director trained in hazardous waste management procedures - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(a)(2).	2	GPT	
5. <input checked="" type="checkbox"/> Personnel training plan on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d).	2	GPT	
6. <input checked="" type="checkbox"/> Gives job title, job description and name of employee filling each position - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(1) and (2).	2	GPT	

7. <input checked="" type="checkbox"/> Written description of introductory and continuing training that will be given to each position - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(3).	2	GPT	COMMENTS
8. <input checked="" type="checkbox"/> Documentation of training completed by personnel - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(4).	2	GPT	
9. <input checked="" type="checkbox"/> Records of current personnel maintained until facility closure, former employee records maintained for at least three years - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(e).	2	GPT	
I. CONTINGENCY PLAN			
1. <input checked="" type="checkbox"/> Contingency plan maintained on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.53(a).	2	GPT	COMMENTS
2. <input checked="" type="checkbox"/> Plan submitted to local emergency response agencies - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.53(b).	2	GPT	
3. <input checked="" type="checkbox"/> Emergency coordinator on-site or on call - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.55.	2	GPT	
4. <input checked="" type="checkbox"/> Plan describes actions personnel must take in response to fires, explosions or other releases of hazardous waste - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(a).	2	GPT	
5. <input checked="" type="checkbox"/> Describes arrangements with emergency response agencies - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(c).	2	GPT	
6. <input checked="" type="checkbox"/> Lists names, addresses and phone numbers (home and office) of emergency coordinators - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(d).	2	GPT	
7. <input checked="" type="checkbox"/> Primary emergency coordinator designated - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(d).	2	GPT	
8. <input checked="" type="checkbox"/> List emergency equipment including description, location and capabilities - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(e).	2	GPT	
9. <input checked="" type="checkbox"/> Evacuation plan, if applicable, designates primary and secondary routes and evacuation signal - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(f).	2	GPT	-spill control
J. USED OIL STORAGE			
1. <input checked="" type="checkbox"/> Used oil is managed properly and not disposed of into the environment or cause a public nuisance - 10 CSR 25-11.279(2)(B)4.B.	1		COMMENTS
2. <input checked="" type="checkbox"/> Containers in good condition - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(b)(1).	2		
3. <input checked="" type="checkbox"/> Containers storing used oil are not leaking - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(b)(2).	2		
4. <input checked="" type="checkbox"/> Containers/aboveground tanks are labeled or marked clearly "Used Oil" - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(c)(1).	2		
5. <input checked="" type="checkbox"/> Fill pipes used to transfer used oil into underground storage tanks are labeled or marked clearly "Used Oil" - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(c)(2).	2		
6. <input checked="" type="checkbox"/> Containers/tanks which are exposed to rainfall are closed - 10 CSR 25-11.279(2)(C)6.	2		
7. <input checked="" type="checkbox"/> Clean up any spills or leaks of used oil - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(d).	2		
8. <input checked="" type="checkbox"/> Mixtures of used oil and hazardous waste are properly managed - 10 CSR 25-11.279(2)(B)2.	2		
K. ON-SITE BURNING			
1. <input type="checkbox"/> Burn only their own used oil or used oil from DIY'ers or exempt farmers - 10 CSR 25-11.279(1) incorporating 40 CFR 279.23(a).	1		
2. <input type="checkbox"/> Burn only in space heaters with design capacity < .5 million BTU/hr - 10 CSR 25-11.279(1) incorporating 40 CFR 279.23(b).	1		
3. <input type="checkbox"/> Combustion gases from the heater are vented to the ambient air - 10 CSR 25-11.279(1) incorporating 40 CFR 279.23(c).	1		

L. OFF-SITE SHIPMENTS TO APPROVED COLLECTION CENTERS

1. <input checked="" type="checkbox"/> Used oil is transported by transporters who have obtained EPA identification numbers - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24.	1
(if no licensed transporter is used)	
2. <input type="checkbox"/> Transports used oil in a vehicle owned by the generator or owned by an employee of the generator - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24(a)(1).	2
3. <input type="checkbox"/> Transports no more than 55 gallons of used oil at any time - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24(a)(2).	2
4. <input type="checkbox"/> Transports the used oil to a used oil collection center that is registered, licensed, permitted, or recognized by a state/county/municipal government to manage used oil - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24(a)(3).	2
OR	
5. <input type="checkbox"/> Transports the used oil to an aggregation point that is owned and/or operated by the same generator - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24(b)(3).	2
OR	
6. <input type="checkbox"/> Used oil is reclaimed under a contractual agreement (tolling arrangement) - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24(c).	2

M. RESOURCE RECOVERY

1. <input checked="" type="checkbox"/> RR certification for energy recovery or reclamation of hazardous waste on-site - 10 CSR 25-9.020(1)(A)3.	1	GOR
2. <input type="checkbox"/> Still bottoms or RR residues disposed of properly - Section 260.380.1(7) RSMo.	1	GOR
3. <input type="checkbox"/> Facility is classified as U, R1 or R2 accurately - 10 CSR 25-9.020(3)(A)	2	GOR
4. <input type="checkbox"/> Facility meets the operating conditions of certification - 10 CSR 25-9.020(3)(E)3.	2	GOR
5. <input type="checkbox"/> Facility has submitted a written request and received approval from the DNR for all changes in operation including closure - 10 CSR 25-9.020(3)(E) 1 and 2.	2	GOR
6. <input type="checkbox"/> Facility report submitted to DNR quarterly - 10 CSR 25-9.020(3)(E) 6 referencing 10 CSR 25-7.264(2)(E)3.	2	GOR
7. <input type="checkbox"/> Facility maintains a written operating record - 10 CSR 25-9.020(3)(E) 5 referencing 40 CFR 264.73(b)(1) & (2) as modified by 10 CSR 25-7.264(2)(E)2.	2	GOR
8. <input type="checkbox"/> Facility has notified EPA and the state that it qualifies for a small quantity on-site burner exemption or has interim status or a permit if it burns hazardous waste on-site - 10 CSR 25-7.266(1) incorporating 40 CFR 266.108 and 40 CFR 266.103.	2	GOR
9. <input type="checkbox"/> R2 facility uses an adequate sampling and analysis plan to assess incoming shipments - 10 CSR 25-9.020(3)(C)1.	2	GOR
10. <input type="checkbox"/> R2 facility maintains a daily log of manifest number, wastes received, disposition of waste and corresponding sampling data - 10 CSR 25-9.020(3)(C)2.	2	GOR
11. <input type="checkbox"/> R2 facility has a written closure plan which meets 40 CFR 264.112 requirements - 10 CSR 25-9.020(3)(C)3 referencing 10 CSR 25-7.264(2)(G).	2	GOR
12. <input type="checkbox"/> R2 facility provides financial assurance for closure - 10 CSR 25-9.020(3)(C)4.	2	GOR

COMMENTS

CHECKLIST KEY

Check the ☒ if in compliance.

Circle the ☐ if not in compliance and provide comment.

N/A = Not Applicable.

An item emphasized by a black line on the left is a serious deviation from the requirements (Class I violation)

An unemphasized item is a significant deviation from the requirements (Class II violation unless conditions warrant Class I)

COMMENTS: INCLUDE DISCUSSION OF FACILITY'S WASTE MINIMIZATION PLAN

Check all Potential Multi-Media Violations and Impacts (specify and comment below if possible)

APC		PDW	
<input type="checkbox"/> Fugitive Dust	<input type="checkbox"/> Asbestos	<input type="checkbox"/> Taste & Odors	<input type="checkbox"/> Color
<input type="checkbox"/> Particulate	<input type="checkbox"/> Odors	<input type="checkbox"/> Bacteria	<input type="checkbox"/> Flow
<input type="checkbox"/> Burning	<input type="checkbox"/> Toxics	<input type="checkbox"/> Pressure	<input type="checkbox"/> Toxics
<input type="checkbox"/> Other		<input type="checkbox"/> Other	
SWM		HW	
<input type="checkbox"/> Open Dumps	<input type="checkbox"/> SLF	<input type="checkbox"/> Transportation	<input type="checkbox"/> USTs/LUSTs
<input type="checkbox"/> Littering	<input type="checkbox"/> Other	<input type="checkbox"/> PCBs	<input type="checkbox"/> Other
<input type="checkbox"/> Waste Tire Dump			
WPC			
<input type="checkbox"/> Animal Waste	<input type="checkbox"/> Sawdust	<input type="checkbox"/> Ground Water	
<input type="checkbox"/> Bypassing	<input type="checkbox"/> Sludge	<input type="checkbox"/> Storm Water	
<input type="checkbox"/> Treatment Plant Oper.	<input type="checkbox"/> Single Family	<input type="checkbox"/> Other	

COMMENTS:

INSPECTOR'S SIGNATURE

Rockelle A. Silva

DATE

10-22-01

11-55 gal - metal spents = 6 empty
9 full

8-29-01

1/83 > w/last

w/last

WASTE OIL AND GREASE IN LAB

For Disposal 5/83 -

6 - Chem Shop - from - full
- grease
4 - 55 GAL - ALUMINUM
GREASE

5 Gals. each of:

- Whitmore's Zinc 50
- Whitmore's Zinc 50
- Whitmore's Zinc 50
- Whitmore's Zinc 50

- Plusco Copper Trim
- Plusco Copper Base
- Plusco Copper Base

- Texaco Crater Fluid H
- Texaco Crater Fluid H
- Texaco Crater Fluid H

Klubers Grease CSSO ultra

Petron open Gear lube 595 NC

Jet Lube J-89

Jet Lube J-89

Fuchs 1000 Gear lube

MOBIL Gear SHC-46m

BestoLife 2000

Whitmore's Drill Steel Lube

2 GALS. Klubers GRAFLOSCON

120 LBS. Petron Gear Shield NC

120 LBS. MOBIL Gear SHC 22m

100 LBS. Cephatyn KG10 HMF 1000

Bob Hammer

Derp...
10/12/90

Grease

Grease

6 empty - metal spents

10/12/90

60 - empty

Aluminum
w/last
only 1/2 full

Aluminum
w/last
only 1/2 full

STEEL WARE

1-55 gal - 400 lbs
grease

STEEL WARE

Call...
3/1/83

Call...
3/1/83

Call...
3/1/83

Call...
3/1/83

Call...
3/1/83

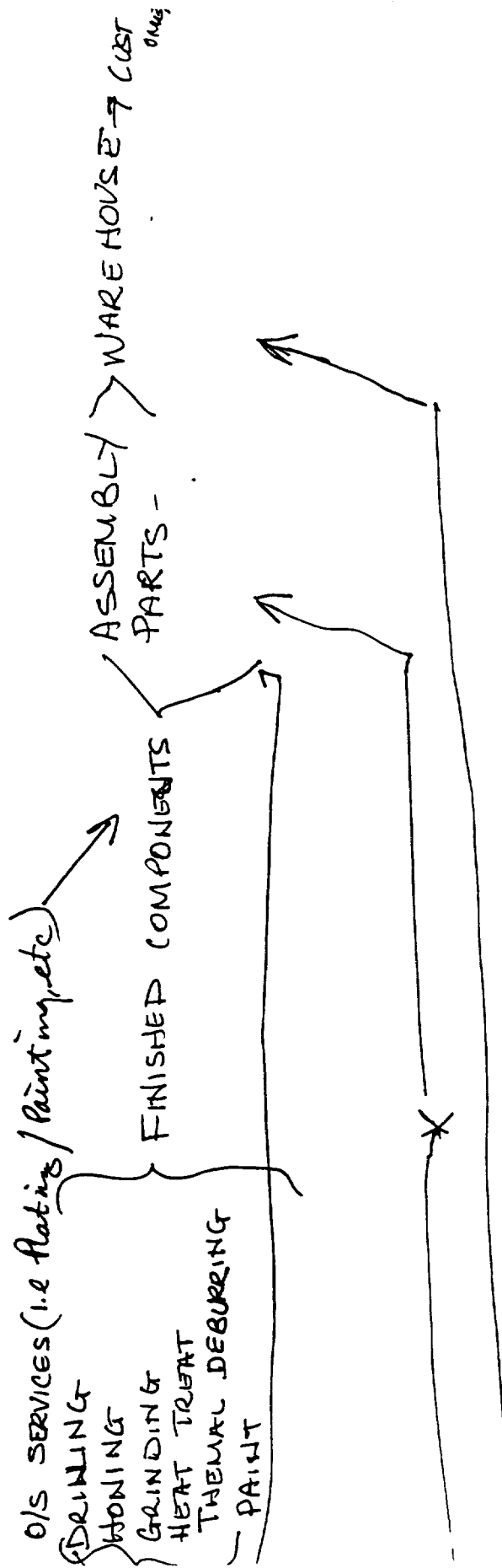
Industrial and Commercial Ecology
Lincoln Industrial
St. Louis, MO Facility

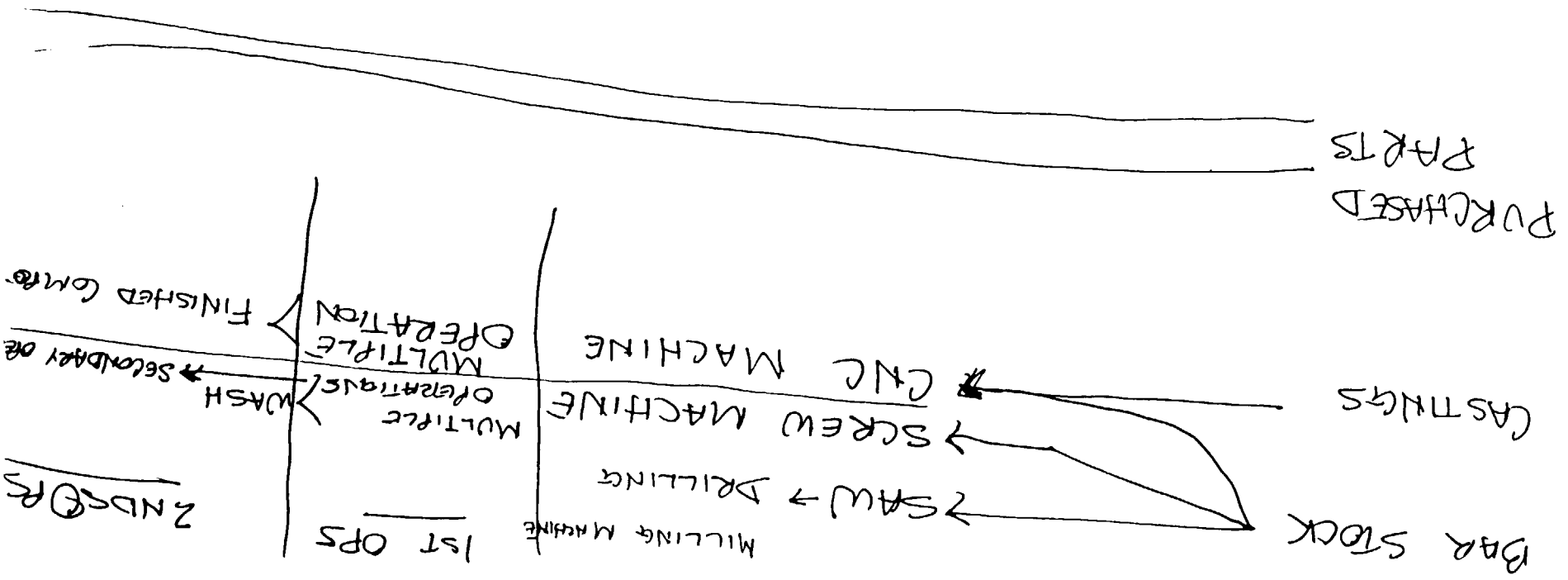
Quantity	Unit	Material	Size	Type	State	Amount
10	ea	Mineral Spirits (Trans-Chemical)	55-gal	Metal	Liquid	Full
6	ea	Mineral Spirits	55-gal	Metal	Liquid	Empty
4	ea	Oil	55-gal	Metal	Empty	Empty
12	ea	Oil/Mineral Spirits/Sludge (total various)	55-gal	Metal	Liquid	Quarter
3	ea	Grease - CAT (Need one open top lid)	55-gal	Metal	Semi-Solid	Residue
3	ea	Component A - Isocyanate Foam Reagent (Carpenter)	55-gal	Metal	Liquid	Eighth
3	ea	Component B - Isocyanate Foam Reagent (Carpenter)	55-gal	Metal	Liquid	Eighth
1	ea	Closed Top - Oil ?	55-gal	Metal	Liquid	Full
2	ea	Closed Top - Oil ?	55-gal	Metal	Liquid	Empty
20	ea	Grease - Palletized	5-gal	Poly	Semi-Solid	Full
3	ea	Grease	20-gal	Metal	Semi-Solid	Full
1	ea	Oil (w/ sticker)	55-gal	Metal	Liquid	Full
4	ea	Grease - Alvania (Need one open top lid)	55-gal	Metal	Semi-Solid	Full

How
generated

Water / Cooler

Drum Size	Contents
55 gal	SHELL ALYANIA GREASE
55 gal	WASTE OIL
120#	WHITMORE'S SURTAC PLUS
120#	WHITMORE'S SURTAC PLUS
120#	JESSCO ARMOR PLATE LF-1
120#	AMALIE BARIUM MOLY EF-1
120#	TRIBOL MOLUB-ALLOY 936 LIGHT
120#	JESSCO DS-OG-WCOO WINTER 20
120#	REL-RAY BR NON-TOX C.S.I.
5 gal	AMOCO AMOJELL PET SNO WH
5 gal	CHEVRON CRC SAMPLE 21
5 gal	PETRON OPEN GEAR LUBE 585 NC
5 gal	TEXACO STARPLEX 2
5 gal	UNISEAL 167.2
5 gal	CHEVRON OPEN GEAR LUBE 100 NC
5 gal	TEXACO STARPLEX 2





LINCOLN
INDUSTRIAL

DATE: 17 OCT 01TO: Rochelle GibsonFAX #: 301-7607FROM: W. M. STEGMANFAX #: (314) 381-7873SUBJECT: MSDS - METHYLPEROLIDONE (PART SOLVENT)8 Pages (including cover sheet)If there is a problem with this transmittal, please call (314) 679-4335

Message:

- Rochelle - Sorry for slow response time - I was out
to court ALL DAY on Tues & today was tied up w/
meetings / conferences / etc -

mmr

BASF Corporation

BASF

Material Safety Data Sheet

Page : 1

Original Date: 05/07/1999
Revision Date: 07/11/2000

BASF CORPORATION
3000 CONTINENTAL DRIVE NORTH

MOUNT OLIVE, NJ 07828
(973) 426-4671

EMERGENCY TELEPHONE: (800) 424-9300 CHEMTREC
(800) 832-HELP (BASF Hotline)

BOTH NUMBERS ARE AVAILABLE DAYS, NIGHTS, WEEKENDS, & HOLIDAYS.

SECTION 1 - PRODUCT INFORMATION

N-METHYLPYRROLIDONE VALUE GRADE

Product ID: NCI 556994

Common Chemical Name:

N-METHYLPYRROLIDONE

Synonyms:

N-METHYLPYRROLIDONE

Molecular Formula:

C(5)H(9)NO

Chemical Family: None

Molecular Wt.:

99.1

SECTION 2 - INGREDIENTS

Chemical Name:	CAS	Amount
2(3H)-FURANONE, DIHYDRO- PEL/TLV NOT ESTABLISHED	96-48-0	2.0 %
2-PYRROLIDINONE, 1-METHYL PEL/TLV NOT ESTABLISHED	872-50-4	97.0 %
WATER PEL/TLV NOT ESTABLISHED	7732-18-5	1.0 %

SECTION 3 - PHYSICAL PROPERTIES

Color:	Clear
Form/Appearance:	Liquid
Odors:	Amine
Odor Intensity:	Mild
Specific Gravity:	Typical 1.028 Low/High U.O.M.
pH:	NOT AVAILABLE
Boiling Pt:	Typical 204.3 Low/High Deg. C Pressure
Freezing Pt:	-23.6 C 760 MM HG
Decomp. Temp:	NOT AVAILABLE
Solubility in Water Description:	Complete
Vapor Pressure:	< 0.32 MILLIBARS X 20 DEG. C XX

BASF Corporation

BASF

N-METHYLPYRROLIDONE VALUE GRADE
NCI 556994

Page : 2

SECTION 4 - FIRE AND EXPLOSION DATA

	Typical	Low/High	Deg.	Method
Flash Point:	91			C ASTM D9373
Autoignition:	270			C DIN 51794
Flam. Limits:		1.3 - 9.5	%	
Extinguishing Media:				
Use CO2 or dry chemical extinguishing media.				
Fire Fighting Procedures:				
Firefighters should be equipped with self-contained breathing apparatus and turn out gear.				
Unusual Hazards:				
There are no known unusual fire or explosion hazards.				

SECTION 5 - HEALTH EFFECTS

Routes of entry for solids and liquids include eye and skin contact, ingestion and inhalation. Routes of entry for gases include inhalation and eye contact. Skin contact may be a route of entry for liquified gases.

Toxicology Test Data:

Rat, Oral LD50 - 4990 MG/KG
Moderately Toxic
Mouse, Oral LD50 - 5270 MG/KG
Slightly Toxic
Rat, Inhalation Safety Screen, 8 hr - SLIGHTLY IRRITATING
No deaths after 8 hour exposure
Rat, 4 hr Inhalation LC50 - > 5.1 MG/L
Moderately Toxic
Rabbit, Primary Skin Irritation - MARKEDLY IRRITATING
TOX TEST RATING NOT FOUND
Rabbit, Eye Irritation - MARKEDLY IRRITATING
TOX TEST RATING NOT FOUND
Rat, 28 day oral study - 257 - 2056 MG/KG
Testicular effects in highest dose group
Rat, 28-Day Feeding Study - NOAEL: 429 MG/KG/DAY
Decreased body weights at high doses
Mouse, 28 day dietary study - NOAEL: 820 MG/KG/DAY
Target organ: kidney
Rat, 90 day feeding & neurotoxicity study - @ 169 - 1344 MG/KG/DAY
NOAEL: Low Dose
Mouse, 3 month oral toxicity, dietary - @ 277 - 1931 MG/KG/DAY
NOAEL: Low Dose
Rat, 90 day Inhalation with Recovery - 0, 0.3, 1, 3 MG/L
Testicular effects in highest dose group
Ames Salmonella Assay with or without S9 - NEGATIVE
No increase in mutation frequency
Mouse Lymphoma Assay with or without S-9 - NEGATIVE
No increase in mutation frequency
Mouse Micronucleus Test: Bone Marrow - NEGATIVE
No clastogenic effects reported
Rat, oral 2 year oncogenicity study - @ 66.4 - 939 MG/KG/DAY
Not carcinogenic in rats

BASF Corporation

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N-METHYLPYRROLIDONE VALUE GRADE
 NCI 556994

Page : 3

SECTION 5 - HEALTH EFFECTS (cont)

Rat, Inhalation Oncogenicity Study - @ 0.04 & 0.4 MG/L
 No evidence of carcinogenicity
 Rat, Oral 2-Gen Reproduction Study - NOEL: 160 MG/KG/DAY
 Reduced fertility & pup survival @ 500
 Rat, Oral Developmental Toxicity Study - @ 332 & 997 MG/KG/DAY
 Embryotoxic and teratogenic at high dose
 Mouse, Oral Developmental Toxicity Study - @ 263 & 1055 MG/KG/DAY
 Embryotoxic and teratogenic at high dose
 Rat dermal teratology range finding test - NOEL: 500 MG/KG/DAY
 Maternal toxicity and embryolethality
 Rat, Dermal Developmental Toxicity Study - NOEL: 237 MG/KG/DAY
 Maternal toxicity and embryolethality
 Rat, Inhalation Developmental Toxicity - @ 0.1 & 0.36 MG/L
 No maternal or developmental toxicity
 Rat, Inhalation Developmental/Repro Test - 10, 50, 116 PPM
 No repro effects; Smaller pups @ 116 ppm

Acute Overexposure Effects:

Contact with the liquid can result in irritation. Skin contact should be avoided. Prolonged skin contact may result in redness and dermatitis.

Acute exposure to gamma butyrolactone may produce eye irritation. Repeated dermal administration in rats at 10 mg/kg has been known to produce mild metabolic acidosis. Repeated exposure at low doses (100 & 200 mg/kg) have been known to produce biphasic activity in rats (an initial reduction in activity followed by a period of hyperactivity). Increased blood pressure has also been known to occur in experimental animals after IV administration, however, this is not considered a relevant route of exposure.

NMP is moderately toxic by all routes of exposure; however, due to its low vapor pressure, dermal exposure represents the primary hazard in most settings. Contact with the liquid results in moderate eye irritation and may cause temporary corneal clouding. Skin contact results in mild irritation; prolonged skin contact may cause redness and dermatitis. Inhalation of the vapors of NMP may result in respiratory irritation. Accidental ingestion of the liquid causes gastric disturbances and may result in nausea and vomiting.

Chronic Overexposure Effects:

In animal studies NMP was embryotoxic by the oral, dermal and intraperitoneal routes, but only after repeated high doses that approached the LD50 or were maternally toxic. Embryotoxicity without maternal toxicity was observed at a high concentration in one rat inhalation study, but not in others. Testicular effects in rats were noted after repeated, high-dose oral and inhalation exposures. NMP was not carcinogenic in rats receiving lifetime exposures via inhalation (100 ppm) or the diet.

First Aid Procedures - Skin:

Wash affected areas with soap and water. Remove and launder contaminated clothing before reuse. If irritation develops, get medical attention.

First Aid Procedures - Eyes:

Immediately rinse eyes with running water for 15 minutes. If irritation develops, get medical attention.

BASF Corporation

BASFN-METHYLPYRROLIDONE VALVE GRADE
NCI 556994

Page : 4

SECTION 5 - HEALTH EFFECTS (cont)

First Aid Procedures - Ingestion:

If swallowed, dilute with water and immediately induce vomiting.
Never give fluids or induce vomiting if the victim is unconscious or
having convulsions. Get immediate medical attention.

First Aid Procedures - Inhalation:

Move to fresh air. Aid in breathing, if necessary, and get
immediate medical attention.

First Aid Procedures - Notes to Physicians:

Not applicable.

First Aid Procedures - Aggravated Medical Conditions:

No data is available which addresses medical conditions that are
generally recognized as being aggravated by exposure to this product.
Please refer to the effects of overexposure section for effects
observed in animals.

First Aid Procedures - Special Precautions:

Not applicable.

SECTION 6 - REACTIVITY DATA

Stability Data:

Stable

Incompatibility:

No data available.

Conditions/Hazards to Avoid:

See Reactivity - Incompatibility section.

Hazardous Decomposition/Polymerization:

Hazardous decomposition products: CO, CO2 and NOx.

Corrosive Properties:

Not corrosive.

Oxidizer Properties:

Not an oxidizer.

SECTION 7 - PERSONAL PROTECTION

Clothing:

Butyl rubber gloves, coveralls, apron, boots as necessary to minimize
contact.

Eyes:

Chemical goggles; also wear a face shield if splashing hazard exists.

Respiration:

If vapors or mists are generated, wear a NIOSH/MSHA approved organic
vapor/mist respirator or an air-supplied respirator as appropriate.

Ventilation:

Use local exhaust to control to recommended P.E.L.

Explosion Proofing:

See Section 4 - Fire and Explosion Data.

Other Personal Protection Data:

Eyewash fountains and safety showers must be easily accessible.
Shower after handling.

SECTION 8 - SPILL-LEAK/ENVIRONMENTAL

General:

Spills should be contained, solidified, and placed in suitable

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N-METHYLPYRROLIDONE VALUE GRADE
NCI 556994

Page : 5

SECTION 8 - SPILL-LEAK/ENVIRONMENTAL (cont)

containers for disposal in a licensed facility. This material is not regulated by RCRA or CERCLA ("Superfund"). Wear appropriate respiratory protection and protective clothing and provide adequate ventilation during clean-up.

Waste Disposal:

Incinerate in a licensed facility. Do not discharge into waterways or sewer systems.

Container Disposal:

Dispose of in a licensed facility. Recommend crushing or other means to prevent unauthorized reuse.

Environmental Toxicity Test Data:

Elimination (method not specified) - > 90 PERCENT

Readily Biodegradable

Biological Oxygen Demand, 5 day - 1100 MG/L

Readily Biodegradable

Chemical Oxygen Demand - 1600 MG/L

Readily Biodegradable

Golden Orfe, static 96 hr LC50 - 4000 MG/L

Insignificant Hazard

Daphnia magna, 24 hr LC50 - > 1000 MG/L

Insignificant Hazard

Acute Algal Toxicity, 72 hr. EC/LC50 - > 500 MG/L

Practically Nontoxic

Toxicity to Bacteria - > 9000 MG/L

Insignificant Hazard

SECTION 9 - STORAGE AND HANDLING

General:

No special requirements needed.

Other Storage and Handling Data:

Consult other sections of this MSDS for information on reactivity and flammability.

SECTION 10 - REGULATORY INFORMATION

TSCA Inventory Status

Listed on Inventory: YES

RCRA Haz. Waste No. : NA

CERCLA: NO Reportable Qty.: (If YES)

NMP is subject to the reporting requirements of SARA Title III, Section 313 and 40CFR372.

State Regulatory Information: (By Component)

NJ/PA/MA RTK

CAS: 96-48-0

NO

NAME: 2(3H)-FURANONE, DIHYDRO-

CAS: 872-50-4

NO

NAME: 2-PYRROLIDINONE, 1-METHYL

CAS: 7732-18-5

NO

NAME: WATER

BASF Corporation

BASFN-METHYLPYRROLIDONE VALVE GRADE
NCI 556994

Page : 6

SECTION 10 - REGULATORY INFORMATION (cont)

Hazard Ratings:

	Health:	Fire:	Reactivity:	Special:
HMIS	2	2	0	NA
NFPA	2	2	0	NA

SECTION 11 - TRANSPORTATION INFORMATION

DOT Proper Shipping Name:

SEE BELOW

DOT Technical Name:

SEE BELOW

DOT Primary Hazard Class:

SEE BELOW

DOT Secondary Hazard Class:

SEE BELOW

DOT Label Required:

SEE BELOW

DOT Placard Required:

SEE BELOW

DOT Poison Constituent:

SEE BELOW

BASF Commodity Codes: NA NA UN/NA Code: NONE E/R Guide:

Bill of Lading Description:

<119 GALLONS NOT REGULATED BY THE DEPARTMENT OF TRANSPORTATION

>119 GALLONS, COMBUSTIBLE LIQUID, NOS (N-METHYL PYRROLIDONE),

NA1993, PGIII

"IMPORTANT: WHILE THE DESCRIPTIONS, DESIGNS, DATA AND INFORMATION CONTAINED HEREIN ARE PRESENTED IN GOOD FAITH AND BELIEVED TO BE ACCURATE, IT IS PROVIDED FOR YOUR GUIDANCE ONLY. BECAUSE MANY FACTORS MAY AFFECT PROCESSING OR APPLICATION/USE, WE RECOMMEND THAT YOU MAKE TESTS TO DETERMINE THE SUITABILITY OF A PRODUCT FOR YOUR PARTICULAR PURPOSE PRIOR TO USE. NO WARRANTIES OF ANY KIND, EITHER EXPRESSED OR IMPLIED, INCLUDING WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, ARE MADE REGARDING PRODUCTS DESCRIBED OR DESIGNS, DATA OR INFORMATION SET FORTH, OR THAT THE PRODUCTS, DESIGNS, DATA OR INFORMATION MAY BE USED WITHOUT INFRINGING THE INTELLECTUAL PROPERTY RIGHTS OF OTHERS. IN NO CASE SHALL THE DESCRIPTIONS, INFORMATION, DATA OR DESIGNS PROVIDED BE CONSIDERED A PART OF OUR TERMS AND CONDITIONS OF SALE. FURTHER, YOU EXPRESSLY UNDERSTAND AND AGREE THAT THE DESCRIPTIONS, DESIGNS, DATA, AND INFORMATION FURNISHED BY BASF HEREUNDER ARE GIVEN GRATIS AND BASF ASSUMES NO OBLIGATION OR LIABILITY FOR THE DESCRIPTION, DESIGNS, DATA AND INFORMATION GIVEN OR RESULTS OBTAINED, ALL SUCH BEING GIVEN AND ACCEPTED AT YOUR RISK".

END OF DATA SHEET

MSDS

Date: 10-17-01
From: Adam
To: Ron Carter
Company: Lincoln Ind.
Fax #: 314-7873

Phone: 314/739-6600 ~ Fax: 314/739-5249

2646 Metro Blvd. ~ Maryland Heights, MO 63043

CHEMCENTRAL/STLOUIS

FAX NO. : 3143817873
CHEMCENTRAL

FROM : CHEMCENTRAL
ATTN : 1000298

Oct. 17 2001 11:25PM PG
0001/007

WE WOULD HAVE CALLED BUT...HAVE A NICE DAY!



MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM
P.O. BOX 176
JEFFERSON CITY, MISSOURI 65102
(573) 751-3176

GENERATOR'S HAZARDOUS WASTE SUMMARY REPORT - PART I

BEFORE COPYING FORM ATTACH SITE IDENTIFICATION LABEL OR ENTER:

LINCOLN A PENTAIR CO.
CONTACT WYONNE COFFEY
ONE LINCOLN WAY
ST LOUIS MO 63102

EPA ID# MOD006269335 MO ID# 001105

GENERATOR'S EPA I.D. NUMBER

GENERATOR'S MISSOURI I.D. NUMBER

NOTE: THE FEDERAL EPA AND MISSOURI GENERATOR I.D. NUMBERS ARE ASSIGNED EXCLUSIVELY TO THE SITE WHERE WASTE IS PRODUCED. YOU MUST NOTIFY THE DEPARTMENT IF THE ADDRESS FOR THE SITE OF GENERATION CHANGES.

NOTE ► PLEASE READ INSTRUCTIONS AND EITHER PRINT OR TYPE

SECTION A - REPORT IDENTIFICATION (Complete Item 1 or Item 2, NOT BOTH)

1. ANNUAL

7/1 _____ (YEAR) to 6/30 _____ (YEAR)

2. QUARTERLY
FOR THE PERIOD ENDING

☐ 9/30 _____ (YEAR) ☐ 12/31 _____ (YEAR)

☒ 3/31 01 (YEAR) ☐ 6/30 _____ (YEAR)

3. PAGE

1 OF 3

SECTION B - GENERATOR IDENTIFICATION

NOTE: Any change in either the mailing or site address from previous reports requires renotification to the Department.

4. GENERATOR'S NAME ☒ SAME AS LABEL

5. GENERATOR CONTACT PERSON (NAME) ☒ SAME AS LABEL

TELEPHONE NUMBER

6. MAILING ADDRESS

CITY

STATE

ZIP CODE

7. PLANT SITE ADDRESS ☒ SAME AS LABEL

CITY

STATE

ZIP CODE

8. NAME OF PARENT FIRM

OFFICE USE ONLY

SECTION C - STATUS OF WASTE GENERATED (CHECK ONE)

9. ☒ SHIPPED OFF-SITE. Complete Part 2, attach completed hazardous waste manifests, sign certification and transmit to the department.

10. ☐ REPORTABLE QUANTITY NOT GENERATED. Sign certification and transmit to the department. (Do not complete Part 2)

11. ☐ REPORTABLE QUANTITY GENERATED BUT NOT SHIPPED OFF-SITE THIS QUARTER. Sign certification and transmit to the department. (Do not complete Part 2)

SECTION D - COMMENTS

12.

SECTION E - CERTIFICATION STATEMENT

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

PRINT NAME

Wyonne Coffey

SIGNATURE

Wyonne Coffey

DATE

5/17/01



MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM
P.O. BOX 176
JEFFERSON CITY, MISSOURI 65102
(573) 751-3176
**GENERATOR'S HAZARDOUS WASTE
SUMMARY REPORT - PART II**

BEFORE COPYING FORM, ENTER THE GENERATOR'S NAME AND
IDENTIFICATION NUMBERS AS SHOWN ON PART I.

GENERATOR NAME Lincoln A Pentair Co
EPA ID NUMBER MO.D00.626.93.85
MISSOURI I.D. NUMBER 00.1.1.05

NOTE ► PLEASE READ INSTRUCTIONS AND EITHER PRINT OR TYPE

ATTENTION: Summarize all shipments made to the Hazardous Waste Management Facility you have identified in Section G below. Additional pages are required for each off-site management facility listed.

SECTION F - REPORT IDENTIFICATION (AS SHOWN ON PART 1)

1. FOR THE PERIOD ENDING (CHECK ONE & FILL IN YEAR)

☐ 9/30 _____ (YEAR) ☐ 12/31 _____ (YEAR)

☒ 3/31 01 (YEAR) ☐ 6/30 _____ (YEAR)

2. PAGE

2 OF 3

SECTION G - FACILITY IDENTIFICATION

3. FACILITY NAME (NAME OF OFF-SITE LOCATION WHERE WASTE WAS DELIVERED)

Onyx Environmental Svcs LLC

4. FACILITY'S EPA I.D. NUMBER

WI.D00.396.7.14.8

5. FACILITY SITE ADDRESS

W124 N9451 Boundary Rd

6. FACILITY'S MISSOURI I.D. NUMBER

CITY Menomonee Falls

STATE WI

ZIP CODE 53051

SECTION H - WASTE IDENTIFICATION

LINE	7. DESCRIPTION OF WASTE SHIPPED TO THE FACILITY LISTED ABOVE	8. EPA HAZARDOUS WASTE NUMBER		9. TAX CODE (SEE INST.)	10. TOTAL AMOUNT OF WASTE	11. UNIT OF MEAS.	12. SPECIFIC GRAVITY	13. FINAL HANDLING CODE
1	Waste Paint Related Material UN1263	D00.1	...		400	P	.	T.50
2	Waste Petroleum Distillates UN1268	D00.1	...		2000	P	.	T.50
3	
4	
5	
6	
7	
8	

SECTION I - TRANSPORTATION SERVICES UTILIZED

14. COMPANY NAME		15. MISSOURI ID NO	US EPA ID NUMBER
a	<u>Onyx Environmental Svcs LLC</u>	<u>2146</u>	<u>WI.D080.631.36.9</u>
b		H.
c		H.

SECTION J - COMMENTS

17.

MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM

P.O. BOX 176

JEFFERSON CITY, MISSOURI 65102

(573) 751-3176

GENERATOR'S HAZARDOUS WASTE
SUMMARY REPORT - PART II

BEFORE COPYING FORM, ENTER THE GENERATOR'S NAME AND
IDENTIFICATION NUMBERS AS SHOWN ON PART I.

GENERATOR NAME

Lincoln A Pentair Co

EPA ID NUMBER

MO.D0062.69.385

MISSOURI I.D. NUMBER

0.0.1.1.0.5

NOTE ► PLEASE READ INSTRUCTIONS AND EITHER PRINT OR TYPE

ATTENTION: Summarize all shipments made to the
Hazardous Waste Management Facility you have identified
in Section G below. Additional pages are required for each
off-site management facility listed.

SECTION F - REPORT IDENTIFICATION (AS SHOWN ON PART 1)

1. FOR THE PERIOD ENDING (CHECK ONE & FILL IN YEAR)

☐ 9/30 _____ (YEAR)

☐ 12/31 _____ (YEAR)

☒ 3/31 01 (YEAR)

☐ 6/30 _____ (YEAR)

2. PAGE

3 OF 3

SECTION G - FACILITY IDENTIFICATION

3. FACILITY NAME (NAME OF OFF-SITE LOCATION WHERE WASTE WAS DELIVERED)

Chemical Waste Management Inc

5. FACILITY SITE ADDRESS

Emelle Facility, Alabama Hwy 17 at Mile Marker 163

CITY
Emelle

STATE

Al

ZIP CODE

35459

4. FACILITY'S EPA I.D. NUMBER

AL.D00062.2.46.4

6. FACILITY'S MISSOURI I.D. NUMBER

2.FA.L.14

SECTION H - WASTE IDENTIFICATION

LINE	7. DESCRIPTION OF WASTE SHIPPED TO THE FACILITY LISTED ABOVE	8. EPA HAZARDOUS WASTE NUMBER	9. TAX CODE (SEE INST.)	10. TOTAL AMOUNT OF WASTE	11. UNIT OF MEAS.	12. SPECIFIC GRAVITY	13. FINAL HANDLING CODE
1	PCB Ballasts from light fixtures	PC.B.1		2,220	K	.	TO.3
2	
3	
4	
5	
6	
7	
8	

SECTION I - TRANSPORTATION SERVICES UTILIZED

14. COMPANY NAME	15. MISSOURI ID NO	US EPA ID NUMBER
a Onyx Environmental Svc. LLC	H-2146	N.J.D0.8063.1.36.9
b Nighthawk Transport Inc.	H-2201	MN.R.0000229.4.7
c	H-

SECTION J - COMMENTS

17. H, 13
PCB contaminated waste was incinerated, Remaining
materials were recovered & recycled



STATE OF WISCONSIN

Chapter 291, Wis. Stats.
Form 4400-66P

Rev. 1-99

ALL COPIES MUST BE LEGIBLE,
PLEASE TYPEState of Wisconsin
Department of Natural Resources
Bureau of Waste Management
Box 8094
Madison, WI 53708

FOR DNR USE ONLY

Form designed for use on elite (12-pitch) typewriter.

Form Approved. OMB No. 2050-

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. M00006269385	Manifest Document No. 001175	2. Page 1 of 1	Information in the shaded area is not required by Federal law	
3. Generator's Name and Mailing Address LINCOLN INDUSTRIAL ONE LINCOLN WAY ST. LOUIS, MO 63120		Site Location If Different ST. LOUIS, MO 63120		A. State Manifest Document Number WIK191064		
4. Generator's Phone () 679-4335		6. US EPA ID Number N3D080631309		B. State Generator's ID 9290019999		
5. Transporter 1 Company Name ONYX ENVIRONMENTAL SVCS L.L.C.		7. Transporter 2 Company Name		C. State Transporter's ID		
9. Designated Facility Name and Site Address ONYX ENVIRONMENTAL SERVICES W124 N4451 BOUNDARY RD. MENOMONEE FALLS, WI 53051		10. US EPA ID Number WID003967148		D. Transporter's Phone 618 271-2800		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol
aX RQ WASTE PAINT RELATED MATERIAL, UN1263, II (D001)		001 DM		00400		P
bX RQ WASTE PETROLEUM DISTILLATES, n.o.s. 3, UN1263, III (D001)		005 DM		02000		P
c. NON-REGULATED MATERIAL, NON-RCRA, NON-DOT, DOT NON-REGULATED, NONE		001 DM		00400		P
d.						
J. Additional Descriptions for Materials Listed Above A)486942 CWDUELS 55DM B)486948 CWDUELS 55DM C)486922 CWDORCSDSS 55DM		K. Handling Codes for Wastes Listed Above				
15. Special Handling Instructions and Additional Information PACKING SLIPS ATTACHED FOR CLARIFICATION EMERGENCY NUMBER-INTOTAC:800 535-5050 IF UNDELIVERABLE RETURN TO GENERATOR MO TRANS ID:H-2146 P20-9761L MO MAN DOC #1001105-0175 IL TRANS ID:UFW0600181-0H						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. If I am a large quantity generator, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name & Position Title LONNIE WILLIAMS MAINT SUPERVISOR		Signature <i>[Signature]</i>		Date 03/07/2010		
17. TRANSPORTER 1 Acknowledgement of Receipt of Materials		Signature <i>[Signature]</i>		Date 03/07/2010		
Printed/Typed Name & Position Title Paul Hillier		Signature <i>[Signature]</i>		Date 03/07/2010		
18. TRANSPORTER 2 Acknowledgement of Receipt of Materials		Signature		Date		
Printed/Typed Name & Position Title		Signature		Date		
19. Discrepancy Indication Space						
20. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name & Position Title		Signature		Date		

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

Copy Distribution: 1 - Generator send to Wis. DNR

4 - Facility retain

Emergency 24 Hour Assistance
and Spill Reporting

Telephone Number: (800) 943-0003

COPY 2-
GENERATOR RETAIN2 - Generator retain
3 - Facility send to Wis. DNR
Copies 1 & 3 mail to Wis. DNR at above address.5 - Facility send to Gen
6 - Transporter retain

Form 4400-66P

Rev. 1-99

**ALL COPIES MUST BE LEGIBLE,
PLEASE TYPE**

State of Wisconsin
Department of Natural Resources
Bureau of Waste Management
Box 8094
Madison, WI 53708

FOR DNR USE ONLY

Form designed for use on elite (12-pitch) typewriter.

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. WI 0000000000	Manifest Document No. 801173	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address THE LINCOLN WAY WILSONVILLE, IN 46091		Site Location If Different THE LINCOLN WAY WILSONVILLE, IN 46091		A. State Manifest Document Number WI K 191064	
4. Generator's Phone (317) 472-4000		6. US EPA ID Number WI 0000000000		B. State Generator's ID 3 2 9 0 0 1 3 9 8 9	
5. Transporter 1 Company Name SAFE ENVIRONMENTAL SVCS INC.		8. US EPA ID Number		C. State Transporter's ID 1639	
7. Transporter 2 Company Name		10. US EPA ID Number		D. Transporter's Phone 618 271-2804	
9. Designated Facility Name and Site Address QUINCY INDUSTRIAL SERVICES 1000 N. WILSONVILLE RD. WILSONVILLE, IN 46091		12. Containers No. Type		E. State Transporter's ID	
				F. Transporter's Phone	
				G. State Facility's ID 03135	
				H. Facility's Phone 262 255-6655	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		13. Total Quantity		14. Unit Wt/Vol	
a. 100 GALLONS FLUORANTHERAL, LIQUID, CORROSIVE		100		GAL	
b. 100 GALLONS FLUORANTHERAL, LIQUID, CORROSIVE		100		GAL	
c. 100 GALLONS FLUORANTHERAL, LIQUID, CORROSIVE		100		GAL	
d. 100 GALLONS FLUORANTHERAL, LIQUID, CORROSIVE		100		GAL	
J. Additional Descriptions for Materials Listed Above A) 486942 CWFUELS 55DM B) 486943 CWFUELS 55DM C) 486922 CWDORMSDSS 55DM		K. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information PACKING SLIPS ATTACHED FOR IDENTIFICATION EMERGENCY RESPONSE INFORMATION AND FOR UNIDENTIFIABLE BETWEEN THE GENERATOR TO TRANSFER TO THE TRANSFER FACILITY NO HAZ (C) #001105- 075					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. If I am a large quantity generator, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name & Position Title LONNIE WILLIAMSON MAN + SUPERVISOR		Signature <i>[Signature]</i>		Date Month Day Year 12/17/99	
17. TRANSPORTER 1 Acknowledgement of Receipt of Materials		Signature <i>[Signature]</i>		Date Month Day Year 03/07/2001	
18. TRANSPORTER 2 Acknowledgement of Receipt of Materials		Signature		Date Month Day Year	
19. Discrepancy Indication Space					
20. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.		Date Month Day Year 03/26/2001			
Printed/Typed Name & Position Title TRUDY WARNKE / RECV. MGR.		Signature <i>[Signature]</i>		Date Month Day Year 03/26/2001	

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

Copy Distribution:

12 Generator send to Wis. DNR

4 - Facility retain

**Emergency 24 Hour Assistance
and Spill Reporting**

2 — Generator retain

3 - Facility send to Wis. DNR

5 — Facility send to Generator

6 - Transporter retain

Copies 1 & 3 mail to Wis. DNR at above address.

COPY 5-

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM

Page 1 of 1

Generator Name: Lincoln Industrial EPA ID # MO000624385 State Manifest No. WTR 19 1064

1. If waste is a wastewater (see 40 CFR 268.2) place "w" next to the applicable code(s)
 2. If waste is subject to any California List restriction enter the letter from below next to each restriction that is applicable. ☐ HOC, ☐ PCBs, ☐ Metals ☐ Acid

3. CODES WITH SUBCATEGORIES (place appropriate letter from section 9 before each code that applies) (See 40 CFR 268 for details)

<input type="checkbox"/> D001 HI-TOC	<input type="checkbox"/> D003 Unexp. Ord. Emg	<input type="checkbox"/> K006 Hydrated	<input type="checkbox"/> P047 Salts	<input type="checkbox"/> P092 Hi Inc./RMERC Res.
<input type="checkbox"/> D001 < 10% TOC-CWA	<input type="checkbox"/> D003 Other Reactives	<input type="checkbox"/> K006 Anhydrous	<input type="checkbox"/> P047 Nonsalts	<input type="checkbox"/> U151 Lo RMERC Res.
<input type="checkbox"/> D001 < 10% TOC-NonCWA	<input type="checkbox"/> D006 Batteries	<input type="checkbox"/> K069 Calcium Sulfate	<input type="checkbox"/> P065 Lo Inc. Res.	<input type="checkbox"/> U151 Lo Not RMERC Res.
<input type="checkbox"/> D002 Non-CWA	<input type="checkbox"/> D008 Lead acid batteries	<input type="checkbox"/> K069 Not Calcium Sulfate	<input type="checkbox"/> P065 Lo RMERC Res.	<input type="checkbox"/> U151 Hi Hg
<input type="checkbox"/> D002 CWA	<input type="checkbox"/> D009 Organic Hg > 260ppm	<input type="checkbox"/> K071 Rmerc Res.	<input type="checkbox"/> P065 Not Inc./RMERC Res.	<input type="checkbox"/> U240 2, 4 D
<input type="checkbox"/> D003 Reactive Cyanide	<input type="checkbox"/> D009 Inorg. Hg > 260	<input type="checkbox"/> K071 Not Rmerc Res.	<input type="checkbox"/> P065 Hi Inc./RMERC Res.	<input type="checkbox"/> U240 2, 4 esters & Salts
<input type="checkbox"/> D003 Reactive Sulfide	<input type="checkbox"/> D009 Hg < 260	<input type="checkbox"/> K106 Lo Rmerc Res.	<input type="checkbox"/> P092 Lo Inc. Res.	
<input type="checkbox"/> D003 Explosive	<input type="checkbox"/> F025 Light ends	<input type="checkbox"/> K106 Not Rmerc Res.	<input type="checkbox"/> P092 Lo RMERC Res.	
<input type="checkbox"/> D003 Water Reactives	<input type="checkbox"/> F025 Spent filter	<input type="checkbox"/> K106 > 260 ppm Hg	<input type="checkbox"/> P092 Not Inc./RMERC Res.	

The subcategory for D018-D043 waste is "treated in nonCWA/nonSDWA facility" unless the following box is checked: ☐ "treated in CWA/SDWA facility"

4. COMMON CODES (Place appropriate letter from section 9 before each code that applies)

<input type="checkbox"/> D004	<input type="checkbox"/> D005	<input type="checkbox"/> D006	<input type="checkbox"/> D007	<input type="checkbox"/> D008	<input type="checkbox"/> D009	<input type="checkbox"/> D010	<input type="checkbox"/> D011	<input type="checkbox"/> D012	<input type="checkbox"/> D013	<input type="checkbox"/> D014	<input type="checkbox"/> D015	<input type="checkbox"/> D016	<input type="checkbox"/> D017	<input type="checkbox"/> D018	<input type="checkbox"/> D019
<input type="checkbox"/> D020	<input type="checkbox"/> D021	<input type="checkbox"/> D022	<input type="checkbox"/> D023	<input type="checkbox"/> D024	<input type="checkbox"/> D025	<input type="checkbox"/> D026	<input type="checkbox"/> D027	<input type="checkbox"/> D028	<input type="checkbox"/> D029	<input type="checkbox"/> D030	<input type="checkbox"/> D031	<input type="checkbox"/> D032	<input type="checkbox"/> D033	<input type="checkbox"/> D034	<input type="checkbox"/> D035
<input type="checkbox"/> U006	<input type="checkbox"/> D037	<input type="checkbox"/> D038	<input type="checkbox"/> D039	<input type="checkbox"/> D040	<input type="checkbox"/> D041	<input type="checkbox"/> D042	<input type="checkbox"/> D043	<input type="checkbox"/> F001	<input type="checkbox"/> F002	<input type="checkbox"/> F003	<input type="checkbox"/> F004	<input type="checkbox"/> F005	<input type="checkbox"/> U002	<input type="checkbox"/> U003	<input type="checkbox"/> U006
<input type="checkbox"/> U007	<input type="checkbox"/> U044	<input type="checkbox"/> U061	<input type="checkbox"/> U072	<input type="checkbox"/> U080	<input type="checkbox"/> U108	<input type="checkbox"/> U117	<input type="checkbox"/> U122	<input type="checkbox"/> U123	<input type="checkbox"/> U136	<input type="checkbox"/> U154	<input type="checkbox"/> U188	<input type="checkbox"/> U213	<input type="checkbox"/> U220	<input type="checkbox"/> U226	<input type="checkbox"/> U279
<input type="checkbox"/> P012	<input type="checkbox"/> P030	<input type="checkbox"/> P051	<input type="checkbox"/> P098	<input type="checkbox"/> P105	<input type="checkbox"/> P205	<input type="checkbox"/> F006	<input type="checkbox"/> F007	<input type="checkbox"/> F008	<input type="checkbox"/> F009	<input type="checkbox"/> F010	<input type="checkbox"/> F011	<input type="checkbox"/> F012	<input type="checkbox"/> F019	<input type="checkbox"/> F039	<input type="checkbox"/> K061

ADDITIONAL CODES (Enter all codes not identified above which are associated with waste)

5. USEPA HAZARDOUS WASTE CODE(S)	6. TREATMENT STANDARDS FOR NON-PHASE II STATES (INDICATE THE APPLICABLE TREATMENT STANDARD 268.41, 268.43 OR SPECIFIED TECHNOLOGY BELOW)	7. HOW MUST THE WASTE BE MANAGED? ENTER THE LETTER FROM BELOW

To identify F039, or UHCs managed in non-CWA, use the "F039/Underlying Hazardous Constituents Form" provided (CWM-2004) and check here: ☐

If no UHCs are present upon generation check here: ☒ Check here if disposal facility will check for all UHCs ☐ (i.e. no UHC form required)

To list additional EPA waste code(s), use the supplemental sheet and check here: ☐ In lieu of supplemental sheet you may use multiple copies of this form.

8. SOLVENT CONSTITUENTS (F001 - F005) Check here if disposal facility will check for all spent solvents

<input type="checkbox"/> Acetone	<input type="checkbox"/> Benzene	<input type="checkbox"/> n-Butyl alcohol	<input type="checkbox"/> Carbon disulfide
<input type="checkbox"/> Carbon Tetrachloride	<input type="checkbox"/> Chlorobenzene	<input type="checkbox"/> O-Cresol	<input type="checkbox"/> Cresols (m&p)
<input type="checkbox"/> Cyclohexanone	<input type="checkbox"/> o-Dichlorobenzene	<input type="checkbox"/> 2-Ethoxyethanol	<input type="checkbox"/> Ethyl acetate
<input type="checkbox"/> Ethyl benzene	<input type="checkbox"/> Ethyl ether	<input type="checkbox"/> Isobutanol	<input type="checkbox"/> Methanol
<input type="checkbox"/> Methylene chloride	<input type="checkbox"/> Methyl ethyl ketone	<input type="checkbox"/> Methyl isobutyl ketone	<input type="checkbox"/> Nitrobenzene
<input type="checkbox"/> 2-Nitropropane	<input type="checkbox"/> Pyridine	<input type="checkbox"/> Tetrachloroethylene	<input type="checkbox"/> Toluene
<input type="checkbox"/> 1,1,1 Trichloroethane	<input type="checkbox"/> 1, 1, 2-Trichloroethane	<input type="checkbox"/> 1, 1, 2-Trichloro, 1, 2, 2-trifluoroethane	<input type="checkbox"/> Trichloroethylene
<input type="checkbox"/> Trichloromono-fluoromethane	<input type="checkbox"/> Xylenes		

9. (States authorized by EPA to manage the LDR program may have regulatory citations different from the 40 CFR citations listed below. Where these regulatory citations differ, your certification will be deemed to refer to those state citations instead of the 40 CFR citations.)

A. Or ☒ RESTRICTED WASTE REQUIRES TREATMENT

This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268 Subpart D, 268.32, or RCRA Section 3004(d)

☐ For Hazardous Debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

B.1 RESTRICTED WASTE TREATMENT TO PERFORMANCE STANDARDS

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR Part 268, Subpart D, and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d) without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

B.2 RESTRICTED WASTES FOR WHICH THE TREATMENT STANDARD IS EXPRESSED AS A SPECIFIED TECHNOLOGY (AND THE WASTE HAS BEEN TREATED BY THAT TECHNOLOGY)

"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.42. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

B.3 GOOD FAITH AND ANALYTICAL CERTIFICATION - FOR INCINERATED ORGANICS

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by incineration in units operated in accordance with 40 CFR Part 264, Subpart O, or 40 CFR Part 265, Subpart O, or by combustion in fuel substitution units operating in accordance with applicable technical requirements, and I have been unable to detect the nonwastewater organic constituents despite having used best good faith efforts to analyze for such constituents. I am aware that there are a significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

B.4 DECHARACTERIZED WASTE REQUIRES TREATMENT FOR UNDERLYING HAZARDOUS CONSTITUENTS

"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic. This decharacterized waste contains underlying hazardous constituents that require further treatment to meet universal treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

C. RESTRICTED WASTE SUBJECT TO A VARIANCE

This waste is subject to a national capacity variance, a treatability variance, or a case-by-case extension. Enter the effective date of prohibition in column 7 above.

☐ For hazardous debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

D. RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT

"I have determined that this waste meets all applicable treatment standards set forth in 40 CFR Part 268 Subpart D, and all applicable prohibition levels set forth in Section 268.32 or RCRA Section 3004(d), and therefore, can be land disposed without further treatment. A copy of all applicable treatment standards and specified treatment methods is maintained at the treatment, storage and disposal facility named above." "I certify under penalty of law that I have personally examined and am familiar with the waste through analysis and testing or thorough knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."

E. WASTE IS NOT CURRENTLY SUBJECT TO PART 268 RESTRICTIONS

This waste is a newly identified waste that is not currently subject to any 40 CFR Part 268 restrictions.

I hereby certify that all information in this and all associated documents is complete and accurate, to the best of my knowledge and information.

Signature [Signature]

Title MAINT. SUPERVISOR

Date 3/7/01

GENERATOR COPY

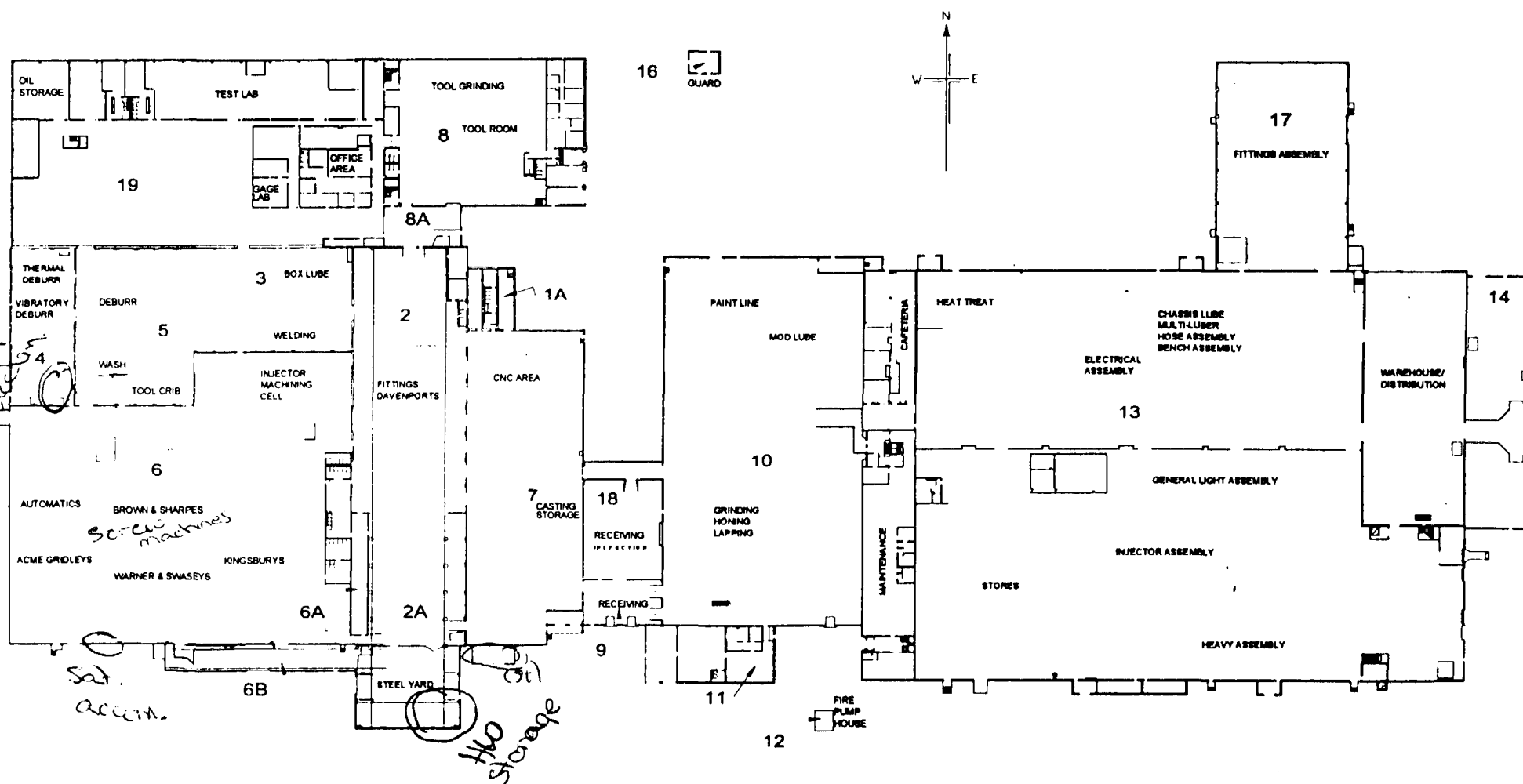
FORM # OES-78

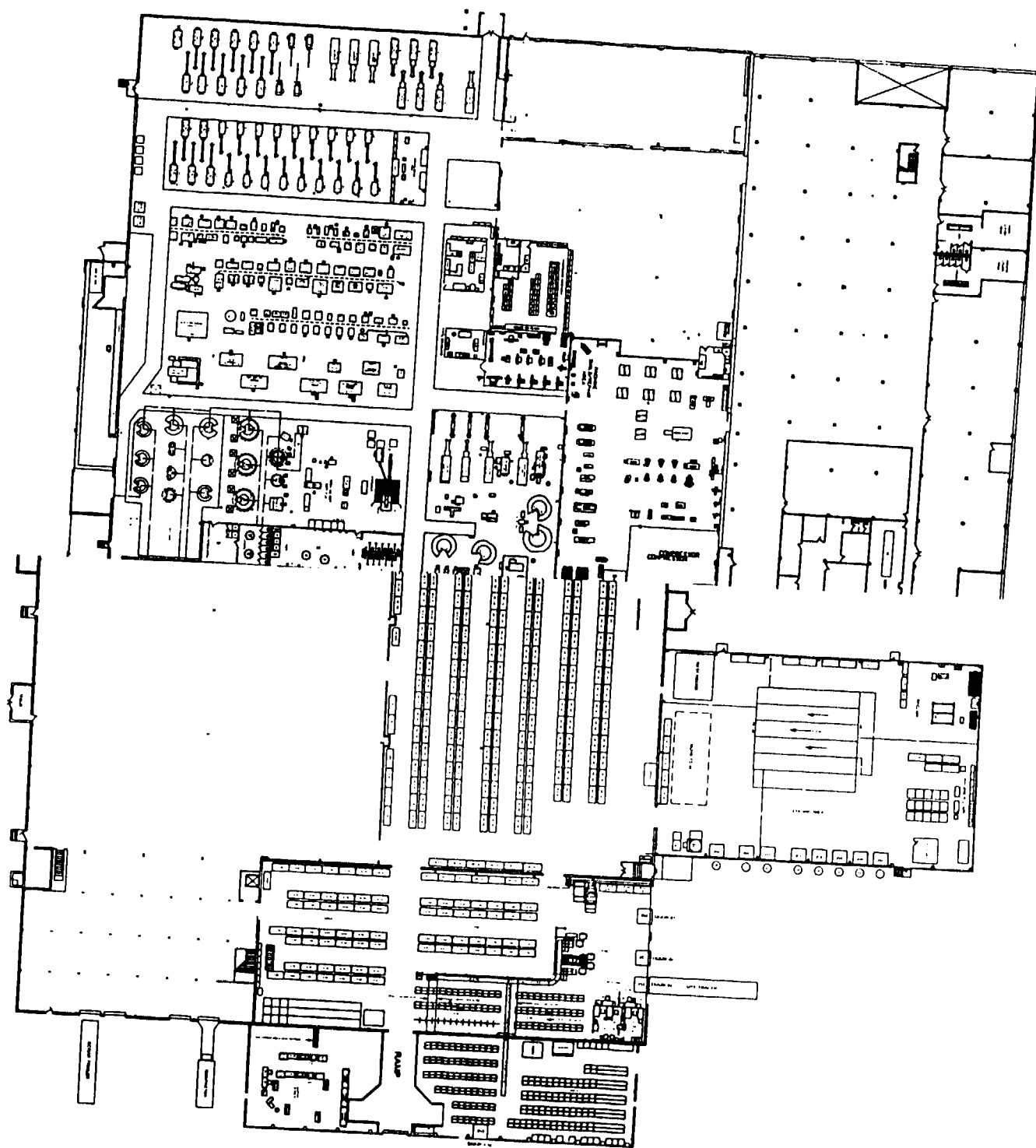


Form Approved. OMB No. 2050-0039. Expires 9-30-91

EPA Form 9700-22 (Rev. 2-95) Previous edition is obsolete.

RELOCATE





Locational Data Collection Sheet

Department of Natural Resources

Division of Environmental Quality

This sheet is used to record required locational data. Attach the *Optional Locational Data Collection Sheet* if you need to record additional information.

1. Key Identifier		(Leave Blank)	
2. Facility ID, Permit Number, or Other Identifier			
mo ID# C01105			
3. Facility or Site		(Name and Physical Address)	
Lincoln, A Pentair Co.		One Lincoln Way	
St Louis, Mo 63120			
4. Data Owner			
(1) DEQ/ADM (2) APCP (3) ESP (4) HWP (5) LRP (6) PDWP (7) SWCP (8) SWMP (9) TAP (10) WPCP Other:			
5. Unit of Measurement			
Degrees, Minutes, Seconds; Decimal Degrees; or UTM (Round to nearest Meter)			
Latitude		Longitude	
N 35° 41' 13.6"		W 90° 16' 3.3"	
Easting		Northing	
Meters		Meters	
		Zone 15 or 16	
6. Method of Determining Location (Indicate the method used to determine the locational data.)			
Address Matching (Geocoding)		Code	
Block/Group		A2	
Digitization		A6	
Nearest Street Intersection		A4	
Other Address Matching		AO	
Primary Street Name		A5	
Street Centerline		A3	
Zip Code Centroid (Center)		Z1	
Census - 1990			
Block Centroid (Center)		C1	
Block/Group Centroid		C2	
Block/Track Centroid		C3	
Other Centroid		CO	
Global Positioning System			
Static Mode		G1	
Kinematic Mode (Dynamic)		G2	
		Differential Post Processing	
		G3	
		Precise Positioning Service	
		G4	
		Signal Averaging	
		G5	
		Real Time Differential Processing	
		G6	
		Interpolation	
		Aerial Photograph	
		I2	
		Topo Map	
		I1	
		Satellite Imagery	
		I3	
		Other Interpolation	
		IO	
		Other	
		Classic Survey	
		S1	
		Land Survey	
		P1	
		Loran C Code	
		L1	
		Quarter Section Description	
		S2	
		Unknown	
		UN	
7. Make & Model of GPS Receiver (if applicable)			
8. Locational Data Accuracy		+/- _____ meters or +/- _____ feet	
9. Type of Locational Data Represented		(Point) Line; or Area	
10. Horizontal Datum (Indicate the horizontal datum used to locate the collection site feature.)			
(1) NAD27, (2) NAD83, (3) WGS84, (4) Unknown Other:			

Locational Data Collection Sheet

Department of Natural Resources

Division of Environmental Quality

11. Collection Site Feature (Mark the feature where the locational data was collected. If needed, use 12. Descriptive Comments to provide more detail. Provide enough information so someone could return to the collection site feature.)

Collection Site Feature	Code		
Bridge	BR	Northeast Corner of the Facility or Site	NE
Building	BL	Northwest Corner of the Facility or Site	NW
Center of Facility or Site	CF	Pile	PL
Described by Descriptive Comment Field	DC	Pipe (Outfall, Intake, Point of Connection, Break, etc.)	OP
Described by Site Name	DS	Rail Road	RR
Equipment Point of Use	EU	Road	RD
Intersection (Road, Pipe, Street, etc.)	IN	Southeast Corner of the Facility or Site	SE
Lagoon or Pond	LS	Southwest Corner of the Facility or Site	SW
Loading Facility or Dock	LD	Stack	AS
Main Access Point (Entrance, Gate, etc.)	MG	Tank, Standpipe, Tower	TK
Main Office	MA	Vent	AV
Missouri Land Survey Monument	MM	Well	WL
Monitoring Station	AM	Unknown	UN
		Other (use Collection Site Descriptive Comments below)	OT

12. Collection Site Descriptive Comments (If needed, further describe the feature represented by the Collection Site Feature. For example, an outfall at the east end of pipe 12, or started at the NW corner, went clockwise around the site, recorded 27 points and ended back at the starting point.)

13. Source of Locational Data

Description	Code	SWRO	D3	LRP	N1	EPA Headquarters	HQ
Citizen	CT	KCRO	D4	PDWP	N2	Private Sector	PV
Contractor	CR	NERO	D5	SWCP	N3	Regulated Entity	RE
Dun & Bradstreet	DB	SLRO	D6	SWMP	N4	Tribe	TR
EPA, Region 7	R7	APCP	D7	TAP	N5	Unknown	UN
JCRO	D1	ESP	D8	WPCP	N6	Other _____	
SERO	D2	HWP	D9	DEQ/Adm	N7		

14. Source Scale Used to Determine the Latitude and Longitude

Scale: 1:24,000; 1:100,000; Other _____; or Unknown

15. Your Name (Please Print)	Rachelle Gibson	Your Phone	(314) 301-7600	Date Collected	10/15/09
--	-----------------	-------------------	----------------	-----------------------	----------



Handler Information



LINCOLN A PENTAIR COMPANY

ST LOUIS

MOD006269385

Select the information to process:

Basic Handler Information						
Handler Id	Handler Name	Facility Identifier	Extract Flag	Region	State	Universes
MOD006269385	LINCOLN A PENTAIR COMPANY		X	07	MO	LQG

Previous Name Information		
Act Loc	Receive Date	Handler Name

Location Address Information								
Act Loc	Street No.	Street	City	County	State	Zip	Land Type	State District
MO	4010	GOODFELLOW BLVD	ST LOUIS	ST LOUIS CITY	MO	63120		04

Mailing Address Information					
Act Loc	Street No.	Street	City	State	Zip
MO	ONE	LINCOLN WAY	ST LOUIS	MO	63120

Contact Information									
Act Loc	Type	Title	First Name	Last Name	Phone	Street	City	State	Zip
MO	A	PLANT ENGINEER	K	JOHNSTON	314-383-5900	4010 GOODFELLOW BLVD	ST LOUIS	MO	63120
MO	N	PLANT ENGINEER	Monica K	JOHNSTON	314-383-5900 34-699-4335	ONE LINCOLN WAY	ST LOUIS	MO	63120

Plant Safety Services Supervisor

Owner Information										
Act Loc	Seq	Indicator	Type	Change Date	Owner/Operator Name	Phone	Street	City	State	Zip
MO	1	CO	P		MCNEIL CORPORATION					

Pentair Inc.

Operator Information										
Act Loc	Seq	Indicator	Type	Change Date	Owner/Operator Name	Phone	Street	City	State	Zip

Miscellaneous Information									
Act Loc	Previous Id	Second Id	Ack Flag	Ack Date	River Basin	TSD Date	Non-notifier	Off-site receipt	Accessibility
MO									

Location Coordinates			
Act Loc	Source	Latitude Measure	Longitude Measure

MO			
----	--	--	--

Environmental Priority Ranking			
Act Loc	EPR Date	EPR Status	EPR Notes

SIC Information				
Act Loc	Seq	Source	Code	Primary
MO	<u>0001</u>	R	3714	P
MO	<u>0002</u>	R	3569	S

Other Permit Information			
Act Loc	Number	Type	Permit Description

Activity Summary Information										
Act Loc	Source	Seq	Receipt Date	Gen - Fed Reg.	Trans - Fed Reg.	TSD - Fed Reg.	HW Fuel - Fed Reg.	Used Oil - Fed Reg.	UIC	Recy
MO	N	1	8/19/1980	LQG - R	-	-	-	-		

Hazardous Waste Stream Information							
Act Loc	Sequence	Source	Date	Amount	Unit of Measure	Desc	
MO	0001	N	8/19/1980	0			

Go To

URL: /Handler/HAND_info_main.asp

10-15-01

Rochelle Wilson

Notification And Waste Stream Information

Epa ID MOD006269385 Missouri ID 001105 Facility Status Large Quantity
Date EPA Id Issued 05/29/1980 Notification Update Was Received: 04/27/1994 Record Add/Changed: 09/09/1999
Company Name LINCOLN, A PENTAIR CO.
Facility Address ONE LINCOLN WAY
ST LOUIS, MO 63120 County ST LOUIS COUNTY
City
Latitude Decimal Format 38.689600 Longitude Decimal Format -90.26105
Method Of Collection Zip Code Centroid Collection Site
Mailing Address ONE LINCOLN WAY
ST LOUIS, MO 63120
Contact Person/Position ~~YVONNE COFFEY~~ Monica Stegman Phone Number (314) 679-4371
4335
Facility Owner PENTAIR, INC. Plant Safety + Services Supervisor
Facility's Owner Address 1500 CO RD B2 W
ST PAUL, MN 55113
Owner's Phone Number (612) 636-7920 Owner Type Private
Property Owner's Name PENTAIR INC
Property Owner's Address 1500 CO RD B2 W
ST PAUL, MN 55113
Property Owner's Phone Number (612) 636-7920 Property Owner Type Private
SIC Code 3569
☐ TSD Facility TSD Identification Number: ☐ Generator/Facility Information is Confidential
RCRA Identification Number: ☐ Large Quantity Handler Of Universal Waste
Registered EPA Hazardous Waste Numbers

10-15-01
Rochelle Gibson

LINE #52584
CIVIL PRINTS

Total Office
Laboratory

DEL

4428-1

St LouisCity 10/15/01 RG
Lincoln, A Pentair Co.
Hazardous waste storage area. Many containers have no visible markings. Black drums on floor contain mineral spirits and/or oils. Drums on top level empty. Red drums and 5-gallon pails in photo contain grease

4428-0

St LouisCity 10/15/01 RG
Lincoln, A Pentair Co.
Hazardous waste storage area. Many containers have no visible markings. Black drums on floor contain mineral spirits and/or oils. Drums on top level empty. Red drums and 5-gallon pails in photo contain grease

Top

4428-3

St LouisCity 10/15/01 RG
Lincoln, A Pentair Co.
Hazardous waste storage area. Blue drums on top left may contain oil sludge.

4428-2

St LouisCity 10/15/01 RG
Lincoln, A Pentair Co.
Hazardous waste storage area. Red and blue 55-gallon drums on left side of photo contain isocyanate components, eight drums.



4428-4

St LouisCity

10/15/01

RG

Lincoln, A Pentair Co.

Hazardous waste storage area. Different view of drums containing isocyanate components, red and blue drums. White drums contain grease.

St. Louis City (HW)
Lincoln, A Pentair Company

MO Dept. of Natural Resources
Hazardous Waste Program
Jefferson City, MO

HW ENF

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Bob Holden, Governor • Stephen M. Mahfood, Director

DIVISION OF ENVIRONMENTAL QUALITY

St. Louis Regional Office
9200 Watson Road, Suite 201, 63126
(314) 301-7600
FAX (314) 301-7607

October 22, 2001

CERTIFIED MAIL: #7001 0360 0002 1791 9086
RETURN RECEIPT REQUESTED

Ms. Monica Stegman
Lincoln, A Pentair Company
One Lincoln Way
St. Louis, MO 63120

Dear Ms. Stegman:

On October 15, 2001, a Resource Conservation and Recovery Act and Missouri Hazardous Waste Management Law Compliance Evaluation Inspection was conducted at Lincoln, A Pentair Company (Lincoln) by Ms. Rochelle Gibson of the St. Louis Regional Office staff. The purpose of the inspection was to determine the compliance status of the facility with regard to applicable federal and state hazardous waste management laws and regulations. The inspection was conducted under the authority of the Resource Conservation and Recovery Act (RCRA) and Sections 260.375(9) and 260.377 of the Missouri Hazardous Waste Management Law (1977) as amended.

The enclosed Notice of Violation (NOV) #5001 lists violations noted during the inspection.

In order to document that corrective actions have been taken, you are requested to submit a written response within 15 days of receipt of the notice. The response should describe the steps taken to correct each of the unsatisfactory features identified. Please direct the response to Ms. Kathy Flippin, Chief, Enforcement Unit, Hazardous Waste Program, Department of Natural Resources, P.O. Box 176, Jefferson City, MO 65102. You should also forward a copy of your response and supporting documentation to this office.

Should you have any questions, or wish to confer in this matter, please contact Rochelle Gibson at (314) 301-7600.

Sincerely,

ST. LOUIS REGIONAL OFFICE

ORIGINAL SIGNED BY
MOHAMAD ALHALABI, P.E.
Mohamad Alhalabi, P.E.
Regional Director

MA/RG/dr

RG

Enclosure: NOV # 5001

c: Ms. Kathy Flippin, Hazardous Waste Program



MISSOURI DEPARTMENT OF NATURAL RESOURCES
NOTICE OF VIOLATION PURSUANT TO REQUIREMENTS OF THE MISSOURI
HAZARDOUS WASTE MANAGEMENT LAW, RULES AND REGULATIONS

5001

FACILITY NAME Lincoln, A Pentair Company			
ADDRESS One Lincoln Way		CITY St. Louis	STATE MO
MISSOURI ID NUMBER 001105		DATE OF INSPECTION 10/15/01	
During an inspection and/or a review of information or documentation completed this date to determine compliance with the requirements of the Missouri Hazardous Waste Management Law, Section 260.350 - 260.550 RSMo, and/or the Rules and Regulations 10 CSR 25 the following violations were identified. The 40/49 CFR regulations cited below have been adopted by reference in the Missouri Hazardous Waste Regulations.			
CITATION		DESCRIPTION OF VIOLATION	
10 CSR 25-5.262(2)(C)2.D	Failure to have containment system for storing greater than 1000 kg liquid hazardous waste.		
40 CFR 262.34(a)(3)	Containers of hazardous waste not marked "Hazardous Waste."		
10 CSR 25-5.262(2)(C)1	Containers of hazardous waste not marked and labeled per Department of Transportation regulations.		
40 CFR 262.34(a)(2)	Containers of hazardous waste not marked with beginning date of accumulation.		
40 CFR 265.35	Adequate aisle space not available in hazardous waste storage area.		
10 CSR 25-5.262(2)(C)2.F(II)	"No Smoking" signs not placed near ignitable wastes.		
10 CSR 25-5.262(2)(C)3	Satellite accumulation containers not marked with identifying contents & beginning date of accumulation.		
10 CSR 25-5.262(2)(C)3	Hazardous waste stored in satellite accumulation area greater than 1 year.		
10 CSR 25-5.262(2)(B)2.A.	Manifest shipment number repeated; not consecutive		
10 CSR 25-5.262(2)(D)1.E.	Manifest summary reports not sent to DNR quarterly.		
This information is provided to call your attention to those areas of noncompliance at the earliest possible time. This notice does not constitute a compliance order issued pursuant to Section 260.410, RSMo and may not be a complete listing of all violations which may be identified as a result of this inspection.			
The owner/operator is hereby requested to submit in writing within 15 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary corrective actions to be taken to: Chief, Enforcement Section, Hazardous Waste Program, Department of Natural Resources, P.O. Box 176, Jefferson City, MO 65102 with a copy to the Director, St. Louis Regional Office, 9200 Watson Road, Suite 201, St. Louis, MO 63126			
The corrective actions taken within 15 days of this notice will be considered in determining whether enforcement action, including the assessment of civil penalties, should be initiated.			
If you have any questions on this notice or wish to discuss your response, you may call Rochelle Gibson at (314) 301-7600 or Kathy Flippin at (573) 751-3176			
Signature of Preparer <u>Rochelle Gibson</u>		Date <u>10-22-01</u>	
The undersigned person hereby acknowledges that he/she received a copy of this Notice and has read same.			
SIGNATURE BY CERTIFIED MAIL		PRINTED NAME	
TITLE		DATE	



MISSOURI DEPARTMENT OF NATURAL RESOURCES
NOTICE OF VIOLATION PURSUANT TO REQUIREMENTS OF THE MISSOURI
HAZARDOUS WASTE MANAGEMENT LAW, RULES AND REGULATIONS

50021

FACILITY NAME Lincoln, A Pentair Company			
ADDRESS One Lincoln Way		CITY St. Louis	STATE MO
ZIP CODE 63120		DATE OF INSPECTION 10/15/01	
MISSOURI ID NUMBER 001105			
During an inspection and/or a review of information or documentation completed this date to determine compliance with the requirements of the Missouri Hazardous Waste Management Law, Section 260.350 - 260.550 RSMo, and/or the Rules and Regulations 10 CSR 25 the following violations were identified. The 40/49 CFR regulations cited below have been adopted by reference in the Missouri Hazardous Waste Regulations.			
CITATION		DESCRIPTION OF VIOLATION	
40 CFR 265.52(e)	Contingency plan failed to include description, location and capabilities of spill control equipment.		
40 CFR 279.22 (c)(1)	Containers of used oil not marked "Used Oil."		
40 CFR 262.34(a)	Storage of hazardous waste exceeds 90 day storage period.		
This information is provided to call your attention to those areas of noncompliance at the earliest possible time. This notice does not constitute a compliance order issued pursuant to Section 260.410, RSMo and may not be a complete listing of all violations which may be identified as a result of this inspection.			
The owner/operator is hereby requested to submit in writing within 15 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary corrective actions to be taken to: Chief, Enforcement Section, Hazardous Waste Program, Department of Natural Resources, P.O. Box 176, Jefferson City, MO 65102 with a copy to the Director, <u>St. Louis</u> Regional Office, <u>9200 Watson Road, Suite 201, St. Louis, MO 63126</u>			
The corrective actions taken within 15 days of this notice will be considered in determining whether enforcement action, including the assessment of civil penalties, should be initiated.			
If you have any questions on this notice or wish to discuss your response, you may call <u>Rochelle Gibson</u> at <u>(314) 301-7600</u> or <u>Kathy Flippin</u> at <u>(573) 751-3176</u> .			
Signature of Preparer <u>[Signature]</u>		Date <u>10-22-01</u>	
The undersigned person hereby acknowledges that he/she received a copy of this Notice and has read same.			
SIGNATURE BY CERTIFIED MAIL		PRINTED NAME	
TITLE		DATE	



MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM
P.O. BOX 176
JEFFERSON CITY, MISSOURI 65102
(573) 751-3176

**GENERATOR'S HAZARDOUS WASTE
SUMMARY REPORT - PART I**

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:		
GENERATOR'S NAME Lincoln Industrial	RECEIVED	
CONTACT PERSON (NAME) Al Adams	NOV 09 2001	
SITE STREET ADDRESS (DO NOT ENTER P.O. BOX) One Lincoln Way	HAZARDOUS WASTE PROGRAM MO DEPT. OF NATURAL RESOURCES	
CITY St. Louis	STATE MO	ZIP CODE 63120
GENERATOR'S EPA I.D. NUMBER MOD006269385	GENERATOR'S MISSOURI I.D. NUMBER 001105	
NOTE: THE FEDERAL EPA AND MISSOURI GENERATOR I.D. NUMBERS ARE ASSIGNED EXCLUSIVELY TO THE SITE WHERE WASTE IS PRODUCED. YOU MUST NOTIFY THE DEPARTMENT IF THE ADDRESS FOR THE SITE OF GENERATION CHANGES.		

NOTE ► PLEASE READ INSTRUCTIONS AND EITHER PRINT OR TYPE

SECTION A - REPORT IDENTIFICATION (Complete Item 1 or Item 2, NOT BOTH)

1. ANNUAL 7/1 _____ (YEAR) to 6/30 _____ (YEAR)	2. QUARTERLY FOR THE PERIOD ENDING <input type="checkbox"/> 9/30 _____ (YEAR) <input type="checkbox"/> 12/31 _____ (YEAR) <input type="checkbox"/> 3/31 _____ (YEAR) <input checked="" type="checkbox"/> 6/30 <u>01</u> (YEAR)	3. PAGE 1 OF 2
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SECTION B - GENERATOR IDENTIFICATION

NOTE: Any change in either the mailing or site address from previous reports requires renotification to the Department.

4. GENERATOR'S NAME <input checked="" type="checkbox"/> SAME AS LABEL			
5. GENERATOR CONTACT PERSON (NAME) <input checked="" type="checkbox"/> SAME AS LABEL		TELEPHONE NUMBER (314) 679-4250	
6. MAILING ADDRESS	CITY	STATE	ZIP CODE
7. PLANT SITE ADDRESS <input checked="" type="checkbox"/> SAME AS LABEL	CITY	STATE	ZIP CODE
8. NAME OF PARENT FIRM Pentair			OFFICE USE ONLY

SECTION C - STATUS OF WASTE GENERATED (CHECK ONE)

9. <input checked="" type="checkbox"/> SHIPPED OFF-SITE. Complete Part 2, attach completed hazardous waste manifests, sign certification and transmit to the department.	10. <input type="checkbox"/> REPORTABLE QUANTITY NOT GENERATED. Sign certification and transmit to the department. (Do not complete Part 2)	11. <input type="checkbox"/> REPORTABLE QUANTITY GENERATED BUT NOT SHIPPED OFF-SITE THIS QUARTER. Sign certification and transmit to the department. (Do not complete Part 2)
--	---	---

SECTION D - COMMENTS

12.

SECTION E - CERTIFICATION STATEMENT

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

PRINT NAME Al Adams	SIGNATURE 	DATE August 7, 2001
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MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM
P.O. BOX 176
JEFFERSON CITY, MISSOURI 65102
(573) 751-3176
**GENERATOR'S HAZARDOUS WASTE
SUMMARY REPORT - PART II**

**BEFORE COPYING FORM, ENTER THE GENERATOR'S NAME AND
IDENTIFICATION NUMBERS AS SHOWN ON PART I.**

GENERATOR NAME	Lincoln Industrial
EPA ID NUMBER	MOD006269385
MISSOURI I.D. NUMBER	0 . 0 . 1 . 1 . 0 . 5

NOTE ► PLEASE READ INSTRUCTIONS AND EITHER PRINT OR TYPE

ATTENTION: Summarize all shipments made to the Hazardous Waste Management Facility you have identified in Section G below. Additional pages are required for each off-site management facility listed.

SECTION F - REPORT IDENTIFICATION (AS SHOWN ON PART I)

1. FOR THE PERIOD ENDING (CHECK ONE & FILL IN YEAR)	2. PAGE
<input type="checkbox"/> 9/30 (YEAR) <input type="checkbox"/> 12/31 (YEAR)	
<input type="checkbox"/> 3/31 (YEAR) <input checked="" type="checkbox"/> 6/30 01 (YEAR)	2 OF 2

SECTION G - FACILITY IDENTIFICATION

3. FACILITY NAME (NAME OF OFF-SITE LOCATION WHERE WASTE WAS DELIVERED)	4. FACILITY'S EPA I.D. NUMBER	
Onyx Environmental Services	WID003967148	
5. FACILITY SITE ADDRESS		
W124 N9451 Boundary Rd.		
CITY	STATE	ZIP CODE
Menomonee Falls	WI	53051

SECTION H - WASTE IDENTIFICATION

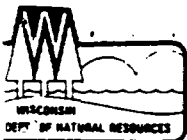
L I N E	6. DESCRIPTION OF WASTE SHIPPED TO THE FACILITY LISTED ABOVE	7. EPA HAZARDOUS WASTE NUMBER	8. TAX CODE (SEE INST.)	9. TOTAL AMOUNT OF WASTE	10. UNIT OF MEAS.	11. SPECIFIC GRAVITY	12. FINAL HANDLING CODE
1	Petroleum Distillates	D0002		3,200	P	.	T50
2						.	.
3						.	.
4						.	.
5						.	.
6						.	.
7						.	.
8						.	.

SECTION I - TRANSPORTATION SERVICES UTILIZED

13. COMPANY NAME	14. MISSOURI ID NO.	15. US EPA ID NUMBER
a Onyx Environmental Services	H 2146	NJD080631369
b	H	
c	H	

SECTION J - COMMENTS

16.



STATE OF WISCONSIN
Chapter 291, Wis. Stats.
Form 4400-66P

Rev. 1-99

ALL COPIES MUST BE LEGIBLE,
PLEASE TYPE

State of Wisconsin
Department of Natural Resources
Bureau of Waste Management
Box 8094
Madison, WI 53708

FOR DNR USE ONLY

Form designed for use on elite (12-pitch) typewriter.

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address LINCOLN INDUSTRIAL THE LINCOLN WPT ST. LOUIS, MO 63109		Site Location If Different ONE LINCOLN WPT ST. LOUIS, MO 63109		A. State Manifest Document Number WI K191406	
4. Generator's Phone () 314 779-1935				B. State Generator's ID	
5. Transporter 1 Company Name ENVIRONMENTAL SERVICES		6. US EPA ID Number 910000000000		C. State Transporter's ID	
7. Transporter 2 Company Name Truitt Motor Transport		8. US EPA ID Number MICD055038998		D. Transporter's Phone 314 271 2201	
9. Designated Facility Name and Site Address ENVIRONMENTAL SERVICES 1001 N. 10TH AVE MILWAUKEE, WI 53212		10. US EPA ID Number 910000000000		E. State Transporter's ID	
				F. Transporter's Phone 800 274 8768	
				G. State Facility's ID	
				H. Facility's Phone 414 255-6855	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	Type	13. Total Quantity	14. Unit We/Vol
a. 100 GALLONS PETROLEUM DISTILLATES, N.O.S.		1	100	100	gals
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above A0426948 CWD FUELS		K. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information NO HAZARDOUS MATERIALS ARE BEING TRANSPORTED IN THIS VEHICLE. THE VEHICLE IS BEING USED TO TRANSPORT NON-HAZARDOUS MATERIALS. THE VEHICLE IS BEING USED TO TRANSPORT NON-HAZARDOUS MATERIALS.					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. If I am a large quantity generator, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name & Position Title J. J. J. J.		Signature J. J. J. J.		Date Month Day Year 11 11 99	
17. TRANSPORTER 1 Acknowledgement of Receipt of Materials Printed/Typed Name & Position Title J. J. J. J.		Signature J. J. J. J.		Date Month Day Year 11 11 99	
18. TRANSPORTER 2 Acknowledgement of Receipt of Materials Printed/Typed Name & Position Title STEVEN L. J. J.		Signature STEVEN L. J. J.		Date Month Day Year 11 11 99	
19. Discrepancy Indication Space					
20. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name & Position Title TRUDY WARNKE / RECV COORD		Signature Trudy Warnke		Date Month Day Year 11 11 99	

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

Copy Distribution:

- 1 - Generator send to Wis. DNR
- 2 - Generator retain
- 3 - Facility send to Wis. DNR

- 4 - Facility retain
- 5 - Facility send to Generator
- 6 - Transporter retain

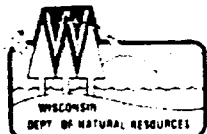
Emergency 24 Hour Assistance
and Spill Reporting

Telephone Number (800) 943-0003

Copies 1 & 3 mail to Wis. DNR at above address.

COPY 5-
FACILITY SEND TO GENERATOR

SEE INSTRUCTIONS ON REVERSE SIDE OF COPY 6.



STATE OF WISCONSIN

Chapter 291, Wis. Stats.

Form 4400-66P

Rev. 1-99

ALL COPIES MUST BE LEGIBLE,
PLEASE TYPE

State of Wisconsin
Department of Natural Resources
Bureau of Waste Management
Box 8094
Madison, WI 53708

FOR DNR USE ONLY

Form designed for use on elite (12-pitch) typewriter.

Form Approved. OMB No. 2050-00

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. M O D 0 0 6 2 6 9 3 8 5		Manifest Document No. 0 0 1 1 7 7		2. Page 1 of 1		Information in the shaded area is not required by Federal law	
3. Generator's Name and Mailing Address LINCOLN INDUSTRIAL ONE LINCOLN WAY ST. LOUIS, MO 63120				Site Location If Different ONE LINCOLN WAY ST. LOUIS, MO 63120		A. State Manifest Document Number WIK19140			
4. Generator's Phone (314 679-4335						B. State Generator's ID			
5. Transporter 1 Company Name ONYX ENVIRONMENTAL SVCS L.L.C.				6. US EPA ID Number N J D 0 8 0 6 3 1 3 6		C. State Transporter's ID			
7. Transporter 2 Company Name				8. US EPA ID Number		D. Transporter's Phone 618 271-2800			
9. Designated Facility Name and Site Address ONYX ENVIRONMENTAL SERVICES W124 N9451 BOUNDARY RD. MENOMONEE FALLS, WI 53051				10. US EPA ID Number W I D 0 0 3 9 6 7 1 4 8		E. State Transporter's ID			
						F. Transporter's Phone			
						G. State Facility's ID			
						H. Facility's Phone 03135			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers		13. Total Quantity		14. Unit Wt/Vol	
a. X RQ WASTE PETROLEUM DISTILLATES, n.o.s. 3,UN1268,II (D001)				No. Type		Quantity		Waste No.	
				008 FM		03200		P D001	
b.									
c.									
d.									
J. Additional Descriptions for Materials Listed Above A)486948 CWD FUELS						K. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information PACKING SLIPS ATTACHED FOR CLARIFICATION EMERGENCY NUMBER-INFOTRAC:800 535-5053 IF UNDELIVERABLE RETURN TO GENERATOR MO MAN DOC# 001105-0177 MO TRANS ID# H-2146 P207077/IL									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. If I am a large quantity generator, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed/Typed Name & Position Title LONNIE WILLIAMS ANN MAINT. SUPERVISOR				Signature <i>[Signature]</i>		Date Month Day Year 0 5 2 1 2 0 0			
17. TRANSPORTER 1 Acknowledgement of Receipt of Materials				Signature <i>[Signature]</i>		Date Month Day Year 0 5 2 1 2 0 0			
Printed/Typed Name & Position Title Jon Krugne				Signature		Date			
18. TRANSPORTER 2 Acknowledgement of Receipt of Materials				Signature		Date			
Printed/Typed Name & Position Title				Signature		Date			
19. Discrepancy Indication Space									
20. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.									
Printed/Typed Name & Position Title				Signature		Date Month Day Year			



MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM
P.O. BOX 176
JEFFERSON CITY, MISSOURI 65102
(573) 751-3176

GENERATOR'S HAZARDOUS WASTE SUMMARY REPORT - PART I

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

GENERATOR'S NAME Lincoln Industrial	
CONTACT PERSON (NAME) Al Adams	
SITE STREET ADDRESS (DO NOT ENTER P.O. BOX) One Lincoln Way	
CITY St. Louis	STATE MO
GENERATOR'S EPA I.D. NUMBER M.O.D.0.0.6.2.6.9.3.8.5	GENERATOR'S MISSOURI I.D. NUMBER 0.0.1.1.0.5

NOTE: THE FEDERAL EPA AND MISSOURI GENERATOR I.D. NUMBERS ARE ASSIGNED EXCLUSIVELY TO THE SITE WHERE WASTE IS PRODUCED. YOU MUST NOTIFY THE DEPARTMENT IF THE ADDRESS FOR THE SITE OF GENERATION CHANGES.

NOTE ► PLEASE READ INSTRUCTIONS AND EITHER PRINT OR TYPE

SECTION A - REPORT IDENTIFICATION (Complete Item 1 or Item 2, NOT BOTH)

1. ANNUAL 7/1 _____ (YEAR) to 6/30 _____ (YEAR)	2. QUARTERLY FOR THE PERIOD ENDING <input checked="" type="checkbox"/> 9/30 2001 (YEAR) <input type="checkbox"/> 12/31 _____ (YEAR) <input type="checkbox"/> 3/31 _____ (YEAR) <input type="checkbox"/> 6/30 _____ (YEAR)	3. PAGE 1 OF 1
--	--	-----------------------

SECTION B - GENERATOR IDENTIFICATION

NOTE: Any change in either the mailing or site address from previous reports requires renotification to the Department.

4. GENERATOR'S NAME <input checked="" type="checkbox"/> SAME AS LABEL			
5. GENERATOR CONTACT PERSON (NAME) <input checked="" type="checkbox"/> SAME AS LABEL		TELEPHONE NUMBER 314-679-4250	
6. MAILING ADDRESS	CITY	STATE	ZIP CODE
7. PLANT SITE ADDRESS <input checked="" type="checkbox"/> SAME AS LABEL	CITY	STATE	ZIP CODE
8. NAME OF PARENT FIRM Pentar			OFFICE USE ONLY

SECTION C - STATUS OF WASTE GENERATED (CHECK ONE)

9. <input type="checkbox"/> SHIPPED OFF-SITE. Complete Part 2, attach completed hazardous waste manifests, sign certification and transmit to the department.	10. <input checked="" type="checkbox"/> REPORTABLE QUANTITY NOT GENERATED. Sign certification and transmit to the department. (Do not complete Part 2)	11. <input type="checkbox"/> REPORTABLE QUANTITY GENERATED BUT NOT SHIPPED OFF-SITE THIS QUARTER. Sign certification and transmit to the department. (Do not complete Part 2)
---	--	---

SECTION D - COMMENTS

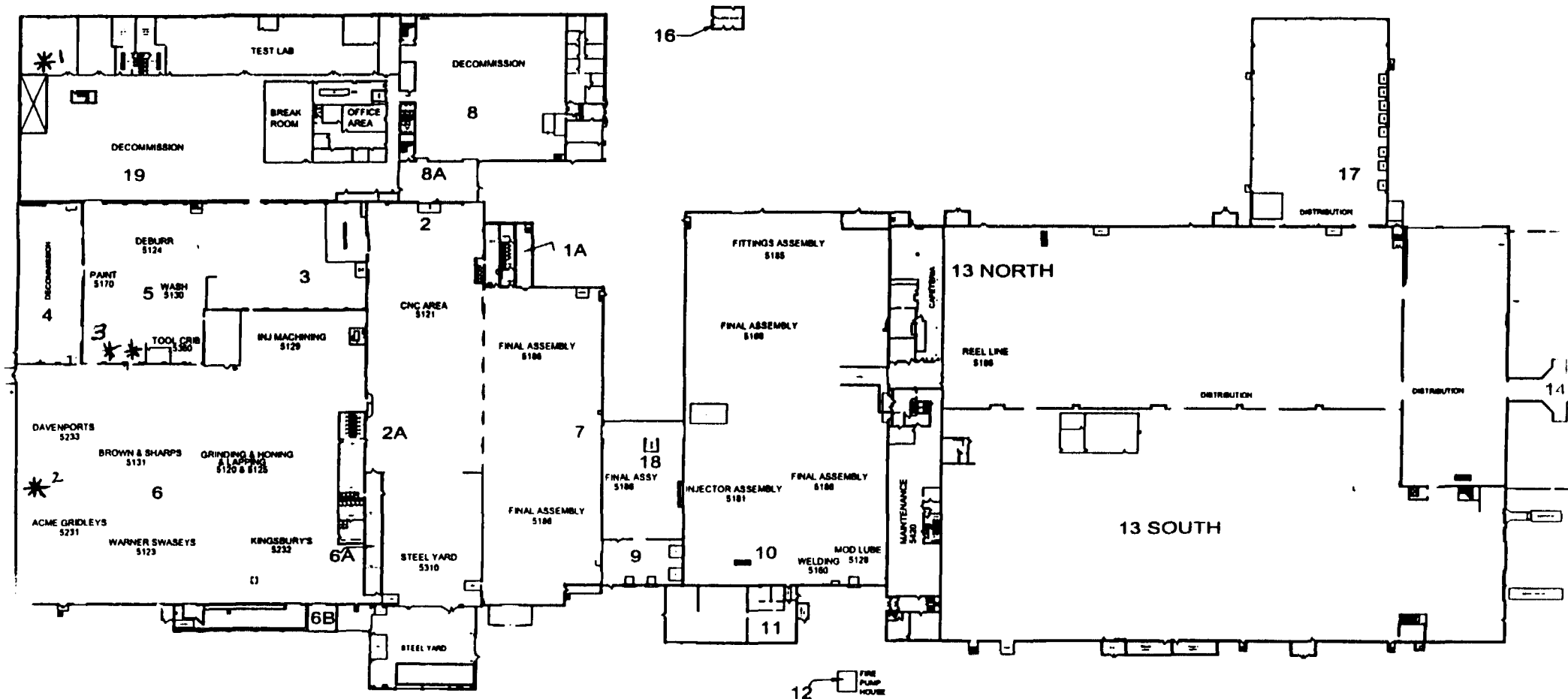
12.

COPY

SECTION E - CERTIFICATION STATEMENT

I certify under penalty of law that I have personally examined an am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

PRINT NAME Al Adams	SIGNATURE <i>Albert D. Adams Jr.</i>	DATE Nov. 7, 2001
------------------------	---	----------------------



Spill Containment Kits/Locations

***1) Spill Kit #302**

95 gal capacity drum, DOT E 9618
Absorbent Pillows, Rolls, Foam Powder, Scrap Bags

Location: Bldg #19, NW Corner

***2) Spill Kit #301**

50 gal capacity drum
Absorbent Foam

Location: Bldg #6, West Wall

***3) Absorbent pads, rolls and desiccant**

Location: Bldg #5, Tool Crib



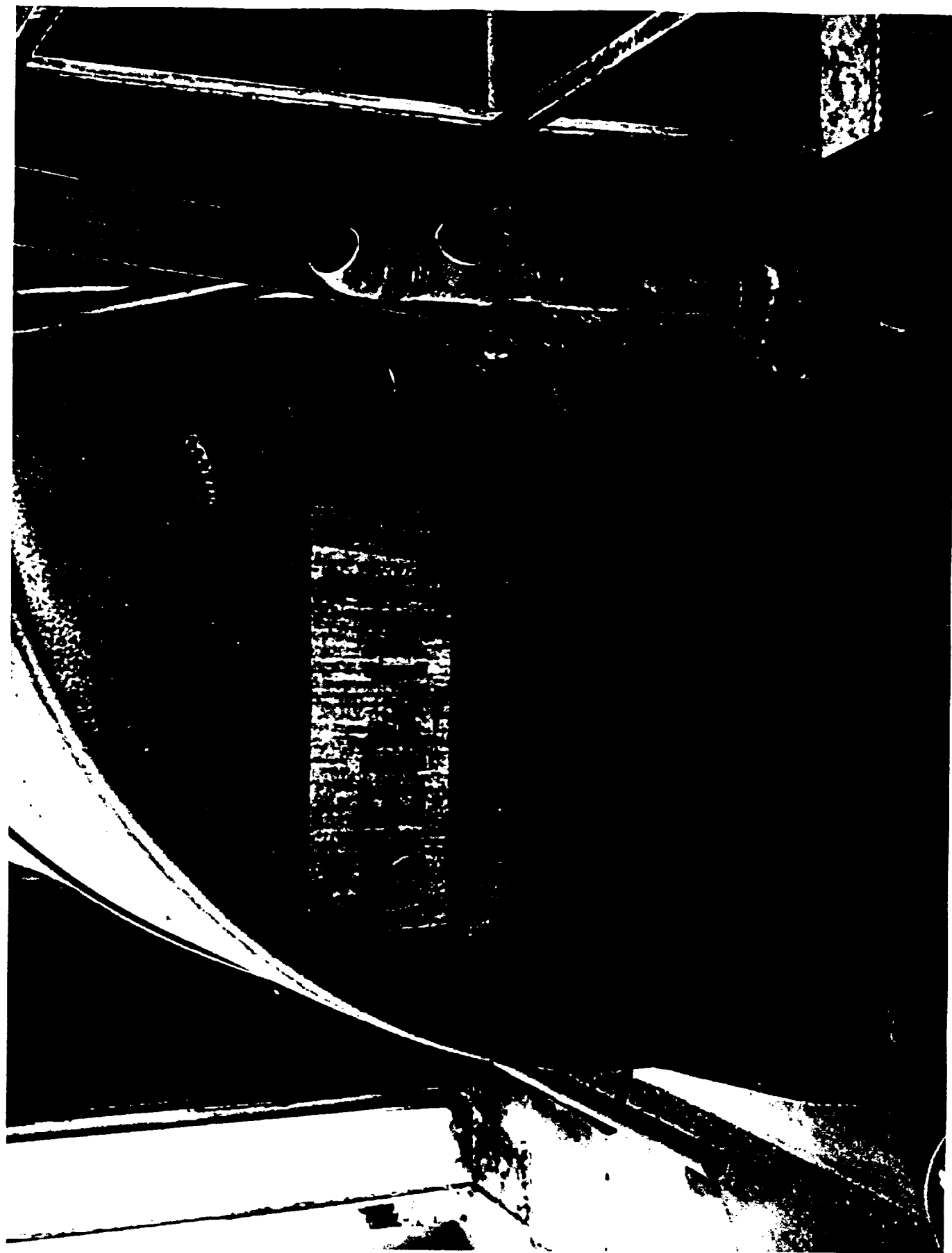
USED
OIL

USED
OIL

USED
OIL

USED
OIL

57
FIRE CONTAINMENT
EQUIPMENT



GATE

18

USED OIL

NOTICE

**THIS AREA
IS UNDER
24 HOUR TV
SURVEILLANCE
TRESPASSERS
WILL BE
PROSECUTED**

**USED
OIL**

From: DONNA DENNING (314)679-4671
LINCOLN INDUSTRIAL
ONE LINCOLN WAY

ST. LOUIS, MO, 63120

REVENUE BARCODE

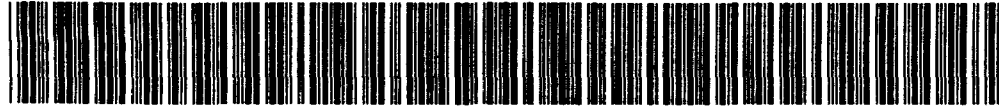


FedEx.

To: Ms. Kathy Flippin (573)751-2032
Enforcement Unit, Haz. Waste Prgrm
Department of Natural Resources
1738 E. Elm Street
Jefferson City, MO, 65102

SHIP DATE: 08NOV01
WEIGHT: 1 LBS

Ref:



DELIVERY ADDRESS BARCODE(FEDEX-EDK)

FedEx **PRIORITY OVERNIGHT**

TRK # 7917 0028 9323 ⁶²⁸¹

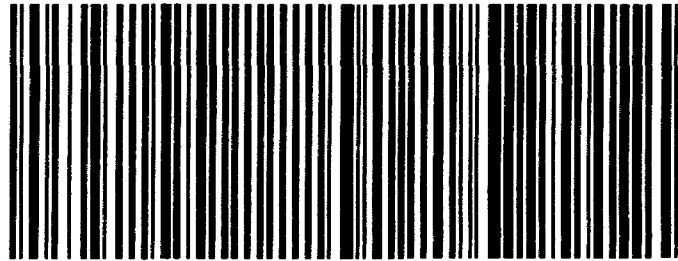
STL

65102-MO-US

59 JEFA

FRI
AA

Deliver by:
09NOV01



When you affix this document to the package, it will be placed in the waybill pouch affixed to your shipment. This document is not to be removed from the pouch and returned to the sender. It is only for your reference. Please do not use this document for shipping. Using a photocopy of this document for shipping could result in a shipment being delayed or lost. The information on your FedEx account may be used for marketing purposes.

Shipping Label



1. Use the "Print" feature from your browser to send this page to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping label pouch and affix it to your shipment so that the barcode portion of the label can be read.
4. To print a receipt of your shipment, please click on "Shipping History."

Ship a New Package

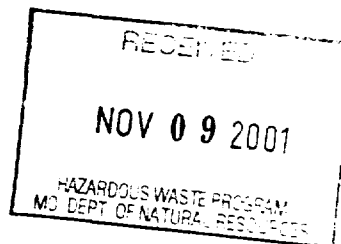


Use of this system constitutes your agreement to the service conditions in the current FedEx service Guide, available upon request.

FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$500, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.

HW/ENF
Lincoln Industries - A Pentair Co.
St. Louis Mo

Albert W. Adams, Jr.
Vice President
Human Resources



LINCOLN
INDUSTRIAL

November 8, 2001

Ms. Kathy Flippin
Chief, Enforcement Unit
Hazardous Waste Program
DEPARTMENT OF NATURAL RESOURCES
P. O. Box 176
Jefferson City, MO 65102

Dear Ms. Flippin:

RE: Notice of Violation (NOV) #5001

This letter is to respond to NOV # 5001. We have reviewed the citations and implemented corrective actions as appropriate. In addition to descriptive narrative, also included are pictures to document actions taken to comply with the relevant citations.

CITATION: 10 CSR 25-5.262(2) (C) 2.D

COMPANY RESPONSE AND CORRECTIVE ACTIONS

Spill containment pallets manufactured by New Pig have been acquired and put into use for storage of liquid hazardous waste. The New Pig containment pallets, have a 94 gallon sump capacity and 5,000 pound weight rating. They are certified to meet the statutory requirements of 40 CFR 264.175 (TSD) Photos are enclosed to demonstrate compliance. See Exhibit A.

CITATION 40 CFR 262.34(a)(3)

COMPANY RESPONSE AND CORRECTIVE ACTIONS

At the time of the on site inspection, Lincoln was in the process of determining the appropriate waste classification as per 40 CFR 261 in preparation for disposal. Historically, used mineral spirits at Lincoln have been managed as both non-hazardous and hazardous depending on the flashpoint. The used mineral spirits were shipped as appropriate on October 25, 2001. All hazardous waste was/is now marked and labeled appropriately.

CITATION 10 CSR 25-5.262(2)(C) 1

COMPANY RESPONSE AND CORRECTIVE ACTIONS

All containers of hazardous waste have been marked and labeled per the Department of Transportation regulations. A copy of the label used is enclosed for reference.

CITATION 40 CFR 262.34(a)(2)

COMPANY RESPONSE AND CORRECTIVE ACTIONS

ISO 9001
Registered

One Lincoln Way, St. Louis, Missouri 63120-1578 (314) 679-4200, Fax (314) 679-4433

A process has been implemented to ensure that any accumulation container used for hazardous waste collection or storage is marked with the beginning date of accumulation. A copy of the label used for this purpose is enclosed

40 CFR 265.35

COMPANY RESPONSE AND CORRECTIVE ACTIONS

Aisle space has been established in accordance with the standard. A photo of the hazardous waste storage area is enclosed to demonstrate compliance. (See Exhibit B)

10 CFR 25-5.262(2)(C) 2.F (II)

COMPANY RESPONSE AND CORRECTIVE ACTIONS

"No Smoking" signs have been prominently placed in the hazardous waste storage area and in the satellite accumulation areas, wherever ignitable wastes are present. Photos are included to demonstrate compliance.

CITATION 10 CSR 25-5.262(2) (C) 3

COMPANY RESPONSE AND CORRECTIVE ACTIONS

Two (2) actions have been taken to ensure that hazardous waste is not stored in the accumulation area for a period greater than one year. Accumulation date labels have been affixed to all containers (sample enclosed) and smaller, (30 gallon UN approved) containers has been ordered for areas with minimal accumulation. A sample of the label in use is enclosed for reference.

CITATION 10 CSR 25-5.262 (2)(B) 2.A

COMPANY RESPONSE

The Company has reviewed its' numbering process to ensure compliance with the consecutive numbering requirement. There were no other instances of duplicate use of numbers in our records.

CITATION 10 CSR 25-5.262(D) 1.E.

COMPANY RESPONSE

The Company respectfully requests dismissal of this citation. Although the second quarter 2001 manifest summary report was not readily available during the onsite audit, it had been submitted in a timely manner. The second quarter report was submitted to the DNR on August 7, 2001. The third quarter report submission was not due until November 14, 2001. Enclosed are copies of both second and third quarter 2001 Manifest Summary Reports. (See Exhibit C).

CITATION 40 CFR 265.52(E)

COMPANY RESPONSE AND CORRECTIVE ACTIONS

The Contingency Plan has been updated to reflect both the plant reconfiguration, (which is currently in progress) and to provide a detailed description of the spill control equipment, its location and capabilities. (See Exhibit D).

CITATION 40 CFR 279.22 (c) (1)

COMPANY RESPONSE AND CORRECTIVE ACTIONS

November 8, 2001

All containers of used oil have been labeled or marked to reflect "Used Oil". Enclosed are photos of the containers with markings.

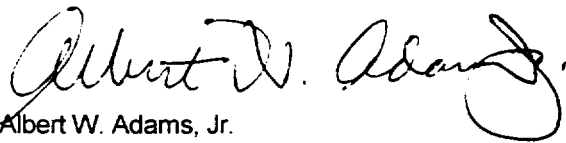
CITATION 40 CFR 262.34 (a)

COMPANY RESPONSE AND CORRECTIVE ACTIONS

A schedule has been implemented to ensure that onsite storage of hazardous waste does not exceed 90 days. Over the past several years' usage of minerals spirits has declined significantly. The Company believed it was subject to a greater on site storage period, due to a perceived small quantity generator status. Never the less, it is the intent of the Company to be fully compliant with the regulations in this area.

The Company trusts the outlined corrective actions meet the intent of the applicable regulations. We invited your office to return and to see firsthand the actions implemented to ensure compliance with the law. Further, we have and will continue to aggressively seek processes and methodologies with the goal of minimization or elimination of any hazardous waste stream.

Sincerely,

A handwritten signature in black ink, appearing to read "Albert W. Adams, Jr.", with a stylized flourish at the end.

Albert W. Adams, Jr.
Vice President Human Resources

Cc: Mohamad Alhalabi, P.E.

Ms. Rochelle Gibson
Ms. Monica Stegman

EXHIBIT A



HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE, OR PUBLIC SAFETY
AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERATOR INFORMATION:

NAME Lincoln Industrial

ADDRESS One Lincoln Way PHONE

CITY St. Louis STATE MO ZIP 63120

EPA ID NO. / MANIFEST DOCUMENT NO. MOD006269385 /

ACCUMULATION START DATE EPA WASTE NO. D001

Waste Flammable liquids, n.o.s.

3, UN1993, PG III

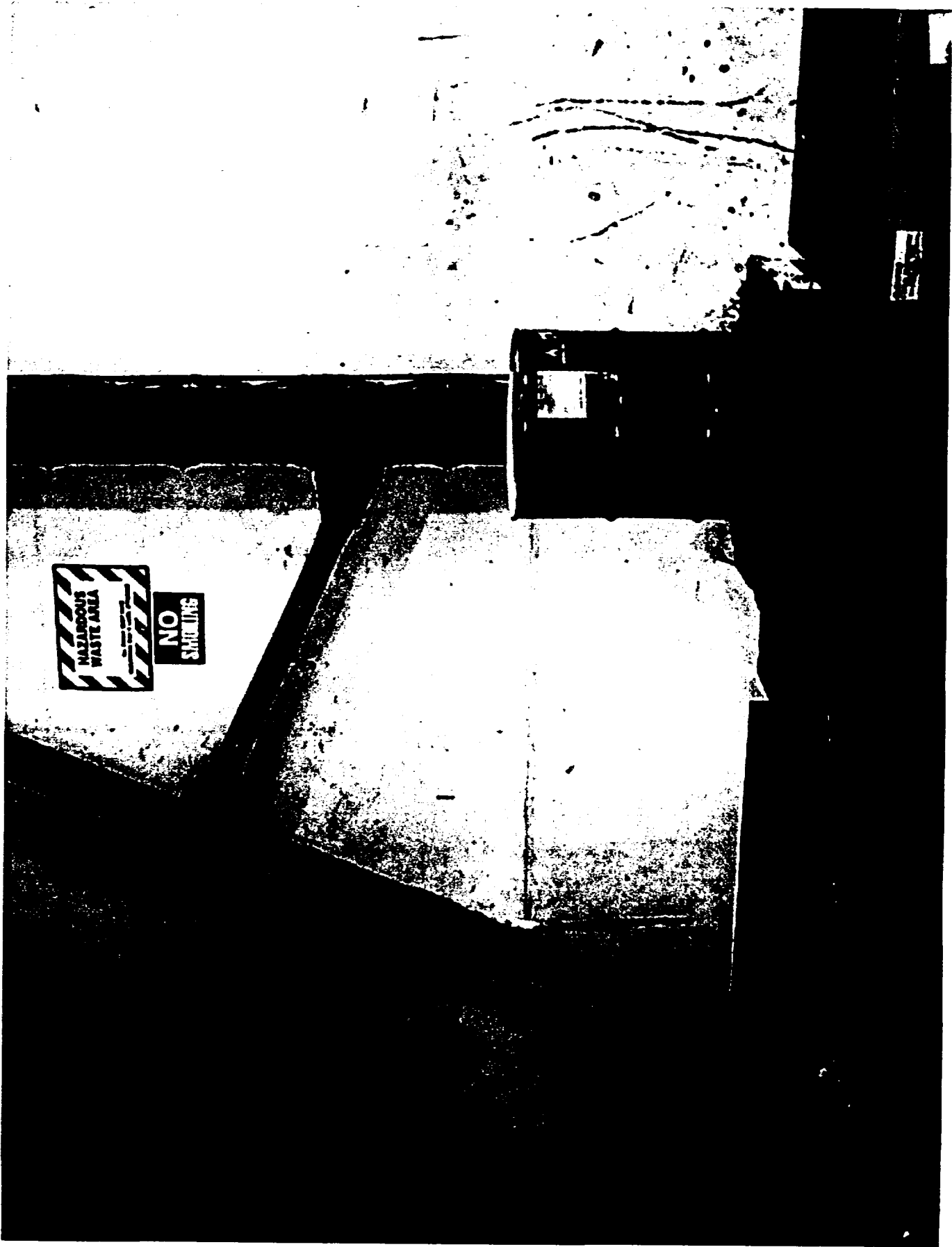
RQ-(D001)

Approval #: 226757

D.O.T. PROPER SHIPPING NAME AND OR UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

PRINTED BY: G C LABEL / 1-800-897-6966 / PRINTED IN U.S.A. / ITEM# HWL400 TYVEK



WORKPLACE ACCUMULATION CONTAINER

Proper D.O.T. Shipping Name: _____

UN or NA# _____

Generator Information:

Name: _____

Facility: _____

Address: _____

Phone: _____

City: _____

State: _____ Zip: _____

EPA / Manifest
ID No. / Document No. _____

State Manifest Document No. _____

EPA Waste No. _____

HAZARDOUS WASTE

**FEDERAL LAW PROHIBITS
IMPROPER DISPOSAL.**

**IF FOUND CONTACT THE NEAREST
POLICE OR PUBLIC SAFETY
AUTHORITY, OR THE U.S.
ENVIRONMENTAL PROTECTION AGENCY.**

HANDLE WITH CARE!

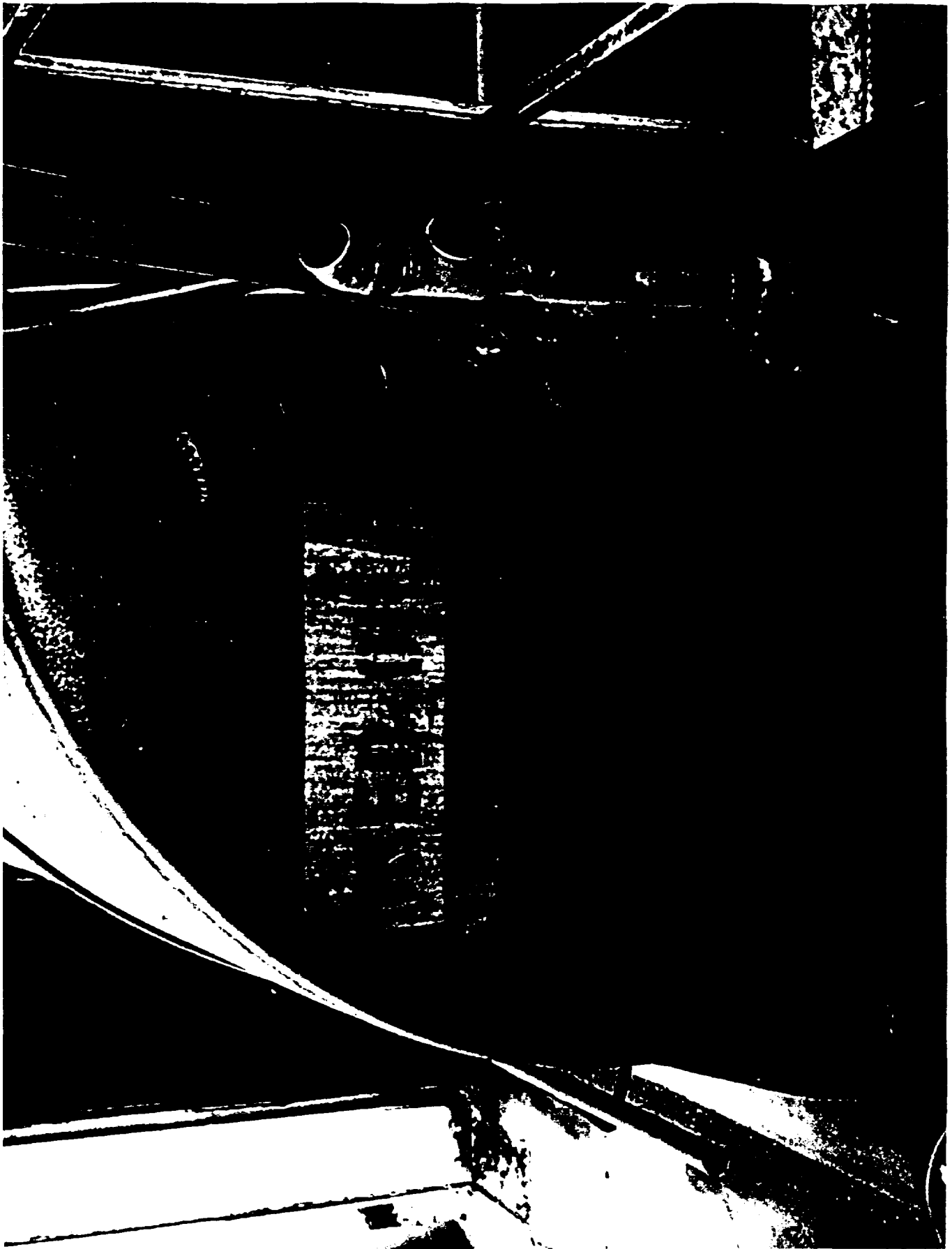
Workplace Accumulation

Start Date: _____

Waste Accumulation

Area: _____

**MANEJESE CON CUIDADO
CONTIENE DESPERDICIOS TOXICOS**



**GATE
18**

WED. 11/1

NOTICE
THIS AREA
IS UNDER
24 HOUR TV
SURVEILLANCE
TRESPASSERS
WILL BE
PROSECUTED

**USED
OIL**

From: DONNA DENNING (314)679-4671
 LINCOLN INDUSTRIAL
 ONE LINCOLN WAY
 ST. LOUIS, MO, 63120

REVENUE BARCODE



To: Ms. Kathy Flippin (573)751-2032
 Enforcement Unit, Haz. Waste Prgm
 Department of Natural Resources
 1738 E. Elm Street
 Jefferson City, MO, 65102

SHIP DATE: 08NOV01
 WEIGHT: 1 LBS

Ref:



DELIVERY ADDRESS BARCODE(FEDEX-EDK)

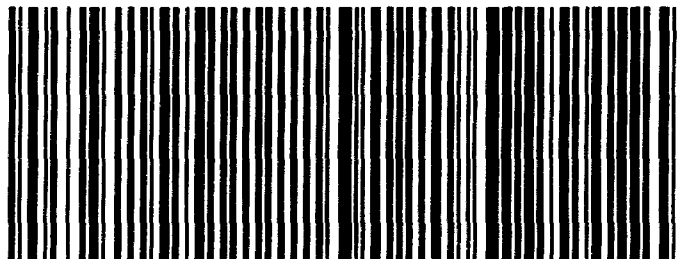
FedEx **PRIORITY OVERNIGHT**
 TRK # 7917 0028 9323 ^{FORM} 6281

65102-MO-US

STL
59 JEFA

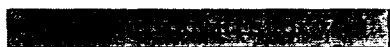
FRI
 AA

Deliver by:
 09NOV01



Please fold this document in half and place it in the shipping pouch affixed to your shipment so that it can be read and scanned.
 WARNING: Use only the printed original label for shipping. Using a photocopy or a label that has been altered could result in
 delivery delays, damage to the contents, or loss of the shipment.

Shipping Label



1. Use the "Print" feature from your browser to send this page to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping label pouch and affix it to your shipment so that the barcode portion of the label can be read.
4. To print a receipt of your shipment, please click on "Shipping History."

Ship a New Package



Use of this system constitutes your agreement to the service conditions in the current FedEx service Guide, available upon request.

FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$500, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Mel Carnahan, Governor • David A. Short, Director

DIVISION OF ENVIRONMENTAL QUALITY

St. Louis Regional Office

10805 Sunset Office Drive, Suite 100 St. Louis, MO 63127-1017

(314)822-0101

FAX (314)822-0943

RECEIVED

ST. LOUIS REGIONAL OFFICE
DIVISION OF ENVIRONMENTAL QUALITY
DEPARTMENT OF NATURAL RESOURCES

July 7, 1995

Mr. Peter J. Wazlawek
Manufacturing Engineering Manager
Lincoln Industries - A Pentair Company
One Lincoln Way
St. Louis, MO 63120-1578

Dear Mr. Wazlawek:

I have reviewed the June 29, 1995, response to Letter of Warning (L.O.W.) #95-SL.029. The review indicates that your facility has corrected the unsatisfactory features noted during the inspection of your facility by implementing the recommendations in the inspection report.

No further response is required by you concerning the L.O.W. at this time. Thank you for your cooperation in this matter.

Sincerely,

W L H

ST. LOUIS REGIONAL OFFICE

Vickie L. Heberlie

Vickie L. Heberlie
Environmental Specialist

VLH/lo

c: HWP ✓

Lincoln Inds - St. Louis - PW Ey

RECEIVED

'95 JUL 6 PM 12 5

LINCOLN

HAZARDOUS WASTE PROGRAM BENTAIR COMPANY
MISSOURI DEPARTMENT OF
NATURAL RESOURCES

June 29, 1995

Ms. Vickie L. Heberlie
Missouri Department of Natural Resources
Division of Environmental Quality
10805 Sunset Office Drive, Suite 100
St. Louis, Mo. 63127-1017

Dear Ms. Heberlie:

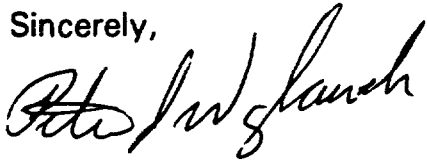
This letter is in response to your LOW #95-SL.029 dated 6/12/95 which originated due to a hazardous waste inspection that you conducted at our facility on 4/20/95. The following issues have been addressed as requested by your letter:

- 1) In order to provide proper secondary containment in our hazardous waste storage area we have purchased five steel spill containment pallets. These pallets can hold four 55 gallon drums each. The pallets have been received and are currently in use. A copy of the purchase order for these pallets is attached for documentation/certification of this action.
- 2) All production supervisors and the associate who transports our hazardous wastes have been advised of the need to mark all satellite storage containers with the beginning date of accumulation. All drums in the plant have been marked accordingly and will be checked as part of our monthly audit system.
- 3) All future hazardous waste manifests will be marked with our Missouri generator ID number.
- 4) All future hazardous waste manifests will include the license plate number of the truck trailer carrying the waste.
- 5) All future hazardous waste manifests will include the specific gravity of the hazardous waste listed on the manifest.
- 6) All out-of-state hazardous waste manifests will include our Missouri generator ID number.

- 7) The home address of our emergency response coordinators has been added to our emergency response plan.

Please feel free to contact me if there are any questions concerning this corrective action.

Sincerely,



Peter Wazlawek
Manufacturing Engineering Manager
Lincoln Industrial

cc: Mr. Tom Judge
Acting Chief, Enforcement Unit
Hazardous Waste Program
P.O. Box 176
Jefferson City, Mo. 65102

Steve Hager
Lincoln Industrial

Yvonne Coffey
Lincoln Industrial

LINCOLN

One Lincoln Way, St. Louis, Mo 63120-1578

PURCHASE ORDER

** REPRINT **

P.O. NUMBER:	10110074
DATE:	06/27/95
PAGE:	1
ORDER TYPE:	AMENDMENT 1

VENDOR NO: 34502	SHIP VIA: BEST WAY	F.O.B.: SHIPPING POINT	CONFIRM: YES
------------------	--------------------	------------------------	--------------

VENDOR: NEW PIG CORPORATION
ONE PORK AVENUE
P.O. BOX 304
TIFTON PA 16884-0304

SHIP TO: LINCOLN
5701 NATURAL BRIDGE
ST. LOUIS, MO. 63120

PHONE NO. (314)679-4290

FAX NO. (314)679-4367

NOTE: CONFIRMED - LOU DO NOT DUPLICATE

TAX: YES

TERMS: NET 30 REFERENCE:

ACCOUNT NO: 5420 210-800 DEPT: 5420

DELIVER TO
YVONNE COFFEYB
I
L
LLINCOLN
ONE LINCOLN WAY
ST. LOUIS, MO. 63120
ATTN: ACCOUNTS PAYABLE

LN	ITEM NUMBER	DESCRIPTION	U/M	QUANTITY	DUE	PRICE PER	TOTAL
001	*STR110J	STEEL SPILL CONTAINMENT PALLET 4 DRUM STEEL	EA	5	05/01/95	629.0000	3145.00

COPY only
ACKNOWLEDGEMENT

REQUISITIONER:	REQUISITION NO:	PAGE TOTAL	3145.00
SPECIAL INSTRUCTIONS:		ADJUSTMENT	
		TAX %	
		P.O. TOTAL \$	3145.00

BUYER'S NAME: STAN HELME

X _____
(BUYER'S SIGNATURE)

ACKNOWLEDGMENT

X _____
(VENDOR SIGNATURE)

St. Louis City (HWP)
Lincoln Industries - A Pentair Company

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

St. Louis Regional Office
10805 Sunset Office Drive, Suite 100 St. Louis, MO 63127-4012
(314)822-0101
FAX (314)822-0913

June 12, 1995

Mr. Peter J. Wazlawek
Manufacturing Engineering Manager
Lincoln Industries - A Pentair Company
One Lincoln Way
St. Louis, MO 63120-1578

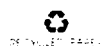
LOW #95-SL.029

Dear Mr. Wazlawek:

This is a Letter of Warning (LOW) and resulted from an April 20, 1995, hazardous waste inspection at Lincoln Industries, located at the above address, conducted by Vickie Heberlie and Julie Watral of my staff. The inspection was conducted under the authority of the Resource Conservation and Recovery Act (RCRA) of 1976 and Sections 260.375(9) and 260.377 of the Missouri Hazardous Waste Management Law (1977) as amended.

Please review the attached inspection report and checklist used by the inspectors during the inspections. The citations circled on the checklist indicate items of noncompliance found during the inspection. The Comments Section of the checklist document the observations of the inspectors that resulted in the citation. In order to ensure the facility returns to compliance, the following is required:

1. Repair all cracks in the base of the hazardous waste storage area containment system and coat the system with an impervious material to prevent any hazardous waste spilled from seeping through the system. Documentation and/or certification this has been done must be submitted to the Department.
2. Ensure that in the future all hazardous waste satellite storage containers will be marked with the beginning date of accumulation.
3. All manifests used to document shipments of hazardous waste in the future must include Missouri generator identification number.




4. All manifests used to document shipments of hazardous waste in the future must include the license plate number of the waste carrying portion of the transporter's truck.
5. Ensure the specific gravity of all hazardous waste listed on manifests in gallons, liters, or cubic yards will be included on all future manifests.
6. All out-of-state manifests used to document shipments of hazardous waste in the future must include Missouri generator identification numbers.
7. List emergency coordinators addresses in the contingency plan and certify in writing this has been done.

Please respond to this Letter of Warning by July 10, 1995. Confirm that each of the items listed above have been addressed and provide documentation, if needed. Address the response and any question you may have to Ms Heberlie. Also send a copy of your response to Mr. Tom Judge, Acting Chief, Enforcement Unit, Hazardous Waste Program, P.O. Box 176, Jefferson City, Missouri 65102.

Sincerely,

ST. LOUIS REGIONAL OFFICE



Robert S. P. Eck
Regional Director

RSPE/VLH/bkk

Enclosures

c: ✓ HWP

507A 5

MISSOURI DEPARTMENT OF NATURAL RESOURCES 532634
Division of Environmental QualityINSTRUCTIONS FOR THE COM-
PLETION OF THIS FORM ARE ON A
SEPARATE SHEET
THIS DOCUMENT MUST BE USED
FOR ALL MISSOURI-DESTINED
SHIPMENTSHazardous Waste Program
P.O. Box 176 Jefferson City, Missouri 65102
314-751-3176

298

HAZARDOUS WASTE MANIFEST 7-21-94

EMERGENCY RESPONSE
U.S. COAST GUARD
1-800-424-8802
CHEM-REC
1-800-424-8800
DEPT. OF NATURAL RESOURCES
314-634-7436

Please print or type (For use on blue (12-pitch) typewriter.)

Form Approved OMB No. 2050-0036 Exp. 10-30-94

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No		Manifest: Document No		2 Page 1 of 1		Information in the spaces above is required by State law	
3 Generator's Name and Mailing Address		M O D 0 0 6 2 6 9 3 8 5 4 3 0 1 2		LINCOLN INDUSTRIAL (ENGINEERING) ONE LINCOLN WAY ST. LOUIS, MO 63120		A. Missouri Manifest Document Number		0 0 1 1 0 5 9 4 3 1 2	
4 Generator's Phone 1 314 679-4296		6 US EPA ID Number		C MO Trans ID H-1772		B. G.S.I. (Gen Site Address)		ONE LINCOLN WAY ST LOUIS, MO 63120	
5 Transporter 1 Company Name		8 US EPA ID Number		D Transporter's Phone 205/492-8340		E MO Trans ID			
7 Transporter 2 Company Name		10 US EPA ID Number		F. Transporter's Phone		G. State Facility's ID		ALD981020894	
9 Designated Facility Name and Site Address		11 US DOT Description (including Proper Shipping Name, Hazard Class and ID Number)		H. Facility's Phone		I. Waste No.			
FISHER INDUSTRIAL SERVICE, INC. 402 WEBSTER CHAPEL RD. GLENCOE, AL 35905		AL D 9 8 1 0 2 0 8 9 4		205/492-8340					
10 WASTE CORROSIVE SOLIDS, N.O.S. (SODIUM HYDROXIDE), 8, UN1759, PG II, RQ:1000 (D002)		PROF#19343		12 Containers		13 Total		14 Unit	
				Number		Type		Quantity	
				1		D M		100	
								EPA WASTE CODE	
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MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM
LARGE QUANTITY GENERATOR
INSPECTION RECORD AND CHECKLIST

L
LOG-INSF

FOR FACILITIES THAT GENERATE/ACCUMULATE > 1000 Kg (2,200 lbs. or approximately, 5 drums)

NAME <u>Lincoln Industries - A Pentair Company</u>		DATE <u>4-20-95</u>	EPA ID NUMBER <u>MO0006269385</u>
ADDRESS <u>One Lincoln Way</u>		RR NO <u>N/A</u>	MO ID NUMBER <u>001105</u>
CITY <u>St. Louis</u>	NUMBER OF EMPLOYEES <u>~500</u>	YEARS AT SITE <u>~88</u>	TELEPHONE NUMBER <u>(314)679-4296</u>
FACILITY REPRESENTATIVE(S), TITLE(S)			

DESCRIPTION OF THE FACILITY'S OPERATIONS AND PLANT.

Lincoln Industries (Lincoln) is a fabricator and finisher of metal products. They are a metal removal/screw machine shop which provides desired products to equipment manufacturers, such as Ford and Caterpillar. They manufacture over 3000 products to a variety of industrial customers. Lincoln receives bar stock (Al, Brass, steel) and/or zinc die castings and machines the castings into the desired product. Manufacturing processes include tool and die work, plating, heat treating, and painting. Lincoln's facility includes general offices, production areas, and a distribution warehouse. Lincoln utilizes Ara-Tex to launder shop towels which are used in solvent and oil clean-up and Laidlaw for hauling their sanitary trash.

WASTE STREAMS

DESCRIBE EACH WASTE STREAM GENERATED INCLUDING THE PRODUCTION PROCESS	GENERATION RATE	EPA ID NUMBER	DISPOSITION
1. Waste Flammable Liquids (Mineral Spirits): Profile #13425 - used for clean-up of parts; degreasing / machine shop	~900G / Quarter	D001, F003	Fisher Industrial Services
2. Waste Flammable Solids (Paint Sludge): Profile #13408 - paint booth overspray and parts cleaning, such as hoses	~100G / Quarter	D001, F003	Fisher Industrial Services
3. Non-Hazardous Waste (Grease and oil): Profile #18034 - maintenance use and assembly / product testing	less than 110G / Quarter	N/A	Fisher Industrial Services
4. Hazardous Waste Solid (Mineral Spirits and Sawdust): Profile #18043 - used to clean up spills	less than one drum per quarter	D001, F003	Fisher Industrial Services
5. Hazardous Waste Solid (Zinc Sludge): Zinc plating and electrofinishing operation	~7 Drums per quarter	F006	PDC Transportation
6. Used Oil: Cutting oils	~13,000G / Qtr.	D098	Safety-Kleen Corp.

CHECK ALL THAT APPLY (Specify if possible)

- | | | |
|---------------------------------------|---|---|
| <input type="checkbox"/> NPDES Permit | <input type="checkbox"/> Lead/Acid Batteries | <input type="checkbox"/> POTW _____ |
| <input type="checkbox"/> Septic Tank | <input type="checkbox"/> H.W. Burner/Blender/Marketer | <input type="checkbox"/> Solid Waste Landfill _____ |
| <input type="checkbox"/> Air Permit | <input type="checkbox"/> Precious Metal Reclamation | <input type="checkbox"/> Waste Water Pretreatment _____ |

A. GENERAL		COMMENTS
1	<input checked="" type="checkbox"/> Registered as a HW Generator - Section 260.380.1 (1) RSMo and 10 CSR 25-5.262 (2)(A)	
2	<input checked="" type="checkbox"/> Facility determines if waste is hazardous - 10 CSR 25-5.262(1) incorporating 40 CFR 262.11	GGR
3	<input checked="" type="checkbox"/> Utilizes a licensed hazardous waste transporter - Section 260.380.1 (5) RSMo	GGR
4	<input checked="" type="checkbox"/> Utilizes authorized HW TSD or RR facility - Section 260.380.1(7) RSMo	GGR
5	<input checked="" type="checkbox"/> Facility does not operate as a TSD - Section 260.390(1) RSMo	GGR

PART 1: WALK-THROUGH INSPECTION

B. PRETRANSPORT, CONTAINERIZATION & STORAGE

Storage does not exceed 90 days or 180/270 days if facility generates more than 1000 Kg/month - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)		COMMENTS
1	<input checked="" type="checkbox"/> Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.171	GPT
2	<input checked="" type="checkbox"/> Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.172	GPT
3	<input checked="" type="checkbox"/> Containers closed in storage - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.173(a)	GPT
4	<input checked="" type="checkbox"/> Containers storing incompatible waste separated or protected from each other by a dike, berm or wall - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.177(c)	GPT
5	<input checked="" type="checkbox"/> Container storage areas have a containment system if holding more than 1000 Kg of liquid hazardous waste - 10 CSR 25-5.262 (2)(C)2.B.(I)	GOR
6	<input type="checkbox"/> Base of containment system is impervious and free of cracks or gaps - 10 CSR 25-5.262 (2)(C)2.B.(III)(a)	GOR
7	<input checked="" type="checkbox"/> Containers protected from contact with accumulated liquids - 10 CSR 25-5.262(2)(C)2.B.(III)(b)	GOR
8	<input checked="" type="checkbox"/> Capacity of containment system = 10% of waste volume or volume of largest container, whichever is greater - 10 CSR 25-5.262(2)(C)2.B.(III)(c)	GOR
9	<input checked="" type="checkbox"/> Run-on onto the containment system is prevented or excess capacity is provided - 10 CSR 25-5.262(2)(C)2.B.(III)(d)	GOR
10	<input checked="" type="checkbox"/> Accumulated liquids removed to prevent overflow of containment - 10 CSR 25-5.262(2)(C)2.B.(III)(e)	GOR
11	<input checked="" type="checkbox"/> Containers of ignitable or reactive waste stored - 50 ft. from property line (or meet requirements) - 10 CSR 25-5.262(2)(C)5. referencing 40 CFR 265.176 as amended by 10 CSR 25-7.265(2)(I)7 and 8	GPT
12	<input checked="" type="checkbox"/> Containers clearly marked "hazardous waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(3)	GPT
13	<input checked="" type="checkbox"/> Waste packaged/labeled/marked per DOT during entire on-site storage period - 10 CSR 25-5.262(2)(C)1	GOR
14	<input checked="" type="checkbox"/> Date of accumulation marked on containers - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(2)	GPT
15	<input checked="" type="checkbox"/> Facility inspected and maintained (weekly) - 10 CSR 25-5.262(2)(C)2.A.(I) and (II) referencing 40 CFR 265.174	GPT
16	<input checked="" type="checkbox"/> Daily inspection of areas subject to spills, i.e., waste handling areas - 10 CSR 25-5.262(2)(C)2.A.(II)	GOR
17	<input checked="" type="checkbox"/> Adequate aisle space is available - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.35	GPT
18	<input checked="" type="checkbox"/> Placards available for transporter - 10 CSR 25-5.262(1) incorporating 40 CFR 262.33	GPT
19	<input checked="" type="checkbox"/> "No Smoking" signs conspicuously placed by ignitable or reactive wastes - 10 CSR 25-5.262(2)(C)2.D.(II)	GOR
20	<input checked="" type="checkbox"/> Waste oil containers in good condition, labeled and closed - 10 CSR 25-11.010(3)(C)	GOR
21		

Cracks observed in storage area containment system

C. SATELLITE ACCUMULATION

1. <input checked="" type="checkbox"/> Containers kept closed - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.173(a)	GPT	COMMENTS
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2. <input checked="" type="checkbox"/> Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.171	GPT
3. <input checked="" type="checkbox"/> Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.172	GPT
4. <input checked="" type="checkbox"/> Quantities accumulated not exceeding 55 gal. (1 quart of acutely-hazardous wastes) - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)	GPT
5. <input checked="" type="checkbox"/> Satellite containers go to storage within 3 days of filling - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(2)	GPT
6. <input type="checkbox"/> Container marked identifying contents & beginning date - 10 CSR 25-5.262(2)(C)3	GOR
7. <input checked="" type="checkbox"/> Stored in satellite areas less than 1 year - 10 CSR 25-5.262(2)(C)3	GOR

COMMENTS

One 55C drum in the injector assembly area, containing mineral spirits had no beginning date

D. PREPAREDNESS AND PREVENTION AND EMERGENCY PROCEDURES

1. <input checked="" type="checkbox"/> Facility operated and maintained to minimize the possibility of an emergency - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.31	GPT
2. <input checked="" type="checkbox"/> Adequate and proper spill control, decontamination and safety equipment available (fire blankets, respirators, SCBA, absorbents, etc.) - 10 CSR 25-5.262 (2)(C)2 E	GPT
3. <input checked="" type="checkbox"/> Adequate water supply and fire control equipment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.32(c) & (d)	GPT
4. <input checked="" type="checkbox"/> Device in the hazardous waste operation area capable of summoning emergency assistance - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.34(a)	GPT
5. <input checked="" type="checkbox"/> Telephone or two-way radio on-site and capable of summoning local fire or police department - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.32(b)	GPT
6. <input checked="" type="checkbox"/> Communication and emergency equipment tested and maintained - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.33	GPT

COMMENTS

E. LOG TANKS

TANK DESIGNATION	CONTENTS	CAPACITY	CONTAINMENT	AGE
1.				
2.	N/A in this section			
3.				
4.				
5. N/A				

1. <input type="checkbox"/> Spill prevention controls in place and operating e.g. check valves, dry discount couplings - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(b)(1)	GPT
2. <input type="checkbox"/> Overfill prevention controls in place and operating e.g. high level alarms, automatic feed cutoff, etc. - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(b)(2)	GPT
3. <input type="checkbox"/> Sufficient freeboard in uncovered tanks to prevent overtopping - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(b)(3)	GPT
4. <input type="checkbox"/> Waste or treatment method compatible with tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(a)	GPT
5. <input type="checkbox"/> Incompatible wastes not placed in same tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.199(a)	GPT
6. <input type="checkbox"/> Ignitable or reactive wastes rendered safe/protected from sources of ignition or reaction - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.198(a)(1) and (2)	GPT
7. <input type="checkbox"/> Ignitable or reactive wastes treated/stored in accordance with NFPA's buffer zone requirements - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.198(b)	GPT

COMMENTS

N/A

8	<input type="checkbox"/> Volatiles with vapor pressure > 76 mm @ 25° C not placed in open tanks - 10 CSR 25-5.262(2)(C)2.D.(I)	GOR
9	<input type="checkbox"/> Wastes and residues removed as hazardous waste and tank and equipment decontaminated upon closure - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.197(a)	GPT
10	<input type="checkbox"/> Secondary containment system provided for tanks and equipment; installed after July 14, 1986; storing dioxin waste; over 15 years old; of unknown age in facility over 15 years old; repaired, replaced or reinstalled after July 14, 1986 - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(a)	GPT
11	<input type="checkbox"/> Secondary containment system constructed of or lined with impervious waste compatible material - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(1)	GPT
12	<input type="checkbox"/> Containment system supported by base capable of preventing failure due to settlement, compression or uplift - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(2)	GPT
13	<input type="checkbox"/> Containment system provided with a leak detection system capable of detecting a release within 24 hours - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(3)	GPT
14	<input type="checkbox"/> Containment system sloped or designed to drain and remove liquids - 10 CSR 25-5.262(2)(C)2.C. referencing 10 CSR 25-5.262(2)(C)2.B.(III)(b)	GOR
15	<input type="checkbox"/> Containment system capable of containing 100% of the capacity of the largest tank - 10 CSR 25-5.262(2)(C)2.C. referencing 10 CSR 25-5.262(2)(C)2.B.(III)(c)	GOR
16	<input type="checkbox"/> Containment system free of cracks or gaps - 10 CSR 25-5.262(2)(C)2.C. referencing 10 CSR 25-5.262(2)(C)2.B.(III)(a)	GOR
17	<input type="checkbox"/> Run-on onto containment system prevented or excess capacity is provided - 10 CSR 25-5.262(2)(C)2.C. referencing 10 CSR 25-5.262(2)(C)2.B.(III)(d)	GOR
18	<input type="checkbox"/> Spilled or leaked waste and precipitation removed from secondary containment within 24 hours or as soon as possible - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(4)	GPT
19	<input type="checkbox"/> Tanks are clearly labeled or marked "Hazardous Waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(3)	GPT
20	<input type="checkbox"/> Daily inspections of overfill/spill control equipment, aboveground portions of tank system, secondary containment, and data gathered from monitoring equipment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.195(a)	GPT
21	<input type="checkbox"/> Inspection log maintained - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.195(c)	GPT
22	<input type="checkbox"/> Cathodic protection systems inspected annually, impressed current sources every two months - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.195(b)	GPT
23	<input type="checkbox"/> Detailed written assessment by an independent, qualified, professional engineer for tanks installed after July 14, 1986, prepared and on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.192	GPT
24	<input type="checkbox"/> Written assessment by an independent, qualified, professional engineer prepared and on-site for tanks lacking secondary containment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.191	GPT
25	<input type="checkbox"/> Leak test, internal inspection or tank integrity exam performed annually and documented, by an independent, qualified, professional engineer for tanks lacking secondary containment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(i)	GPT
26	<input type="checkbox"/> Leak/spill response resulted in: waste flow stopped immediately; waste removal; containment and removal of visible releases to the environment; notification and report; and repair or closure - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.196	GPT

COMMENTS

PART 2: RECORDS INSPECTION

F. MANIFESTS

			COMMENTS
1	<input checked="" type="checkbox"/> Facility uses manifest system - 260.380.1 (6) RSMo. and 10 CSR 25-5.262(2)(B)	GMR	
2	<input checked="" type="checkbox"/> Records maintained for a 3-year period - 10 CSR 25-5.262(1) incorporating 40 CFR 262.40(a)	GRR	
3	<input type="checkbox"/> Generator's MO & EPA I.D. Numbers - 10 CSR 25-5.262(2)(B)	GOR	No mo ID# on manifest document #s 000112 and 118282
4	<input checked="" type="checkbox"/> Manifest document, ID and consecutive shipment numbers - 10 CSR 25-5.262(2)(B)2 A.	GOR	
5	<input checked="" type="checkbox"/> Generator's name, address and phone number - 10 CSR 25-5.262(2)(B)2	GMR	
6	<input type="checkbox"/> All transporters' names, phone numbers, MO & EPA I.D.#s, license plate # - 10 CSR 25-5.262(2)(B)2	GMR	Transporters' license plate # not on manifest document #93012
7	<input checked="" type="checkbox"/> Designated facility name, address, phone, MO & EPA I.D. #, - 10 CSR 25-5.262(2)(B)2	GMR	
8	<input checked="" type="checkbox"/> DOT shipping name, Hazard Class and waste I.D. # (RQ - if required) - 10 CSR 25-5.262(2)(B)2	GMR	
9	<input type="checkbox"/> Containers, quantity and specific gravity designated - 10 CSR 25-5.262(2)(B)2	GMR	Specific gravity not designated on manifest document #93012
10	<input checked="" type="checkbox"/> Manifest signed and dated - 10 CSR 25-5.262(2)(B)2	GMR	
11	<input type="checkbox"/> Out of state manifests have all required MO information - 10 CSR 25-5.262(2)(B)4 A.	GOR	mo ID# missing from out of state manifests (#s 000112 and 118282
12	<input checked="" type="checkbox"/> Manifest continuation sheets are not used - 10 CSR 25-5.262(2)(B)1.	GOR	
13	<input checked="" type="checkbox"/> Manifest returned within 35 days - or exception report submitted within 45 days - 10 CSR 25-5.262(2)(D)2 C.	GRR	
14	<input checked="" type="checkbox"/> Summary Manifest Reports and manifest copies sent to DNR quarterly - 10 CSR 25-5.262(2)(D)1.	GOR	

G. LAND DISPOSAL RESTRICTIONS

			COMMENTS
1	<input checked="" type="checkbox"/> Tests waste or uses knowledge of waste to determine if the waste is restricted from land disposal - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a).	GLB	
2	<input checked="" type="checkbox"/> Dilution of waste to meet LDR treatment standards is not occurring - 10 CSR 25-7.268(1) incorporating 40 CFR 268.3(a)	GLB	
3	<input checked="" type="checkbox"/> "Land-Bag" notification/certification, sent with manifests and retained on-site for five years - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB	
4	<input checked="" type="checkbox"/> Notification/certification includes correct EPA Hazardous Waste number, corresponding treatment standards, manifest number, and waste analysis data - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB	
5	<input checked="" type="checkbox"/> Waste analysis plan on-site and utilized if generator treats hazardous waste in tanks or containers to meet LDR treatment standards - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)(4)	GLB	

H. PERSONNEL TRAINING

			COMMENTS
1	<input checked="" type="checkbox"/> Personnel are trained to respond to emergencies including the use of alarm systems, emergency equipment and contingency plan - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(a)(3).	GPT	Currently updating training plan
2	<input checked="" type="checkbox"/> Employees do not work in unsupervised positions until they have completed the training - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(b)	GPT	
3	<input checked="" type="checkbox"/> Training reviewed annually - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(c)	GPT	
4	<input checked="" type="checkbox"/> Program director trained in hazardous waste management procedures - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(a)(2)	GPT	
5	<input checked="" type="checkbox"/> Personnel training plan on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)	GPT	

6. <input checked="" type="checkbox"/> Gives job title, job description and name of employee filling each position - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(1) and (2)	GPT	COMMENTS
7. <input checked="" type="checkbox"/> Written description of introductory and continuing training that will be given to each position - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(3)	GPT	
8. <input checked="" type="checkbox"/> Documentation of training completed by personnel - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(4)	GPT	
9. <input checked="" type="checkbox"/> Records of current personnel maintained until facility closure, former employee records maintained for at least three years - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(e)	GPT	

I. CONTINGENCY PLAN

1. <input checked="" type="checkbox"/> Contingency plan maintained on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.53(a)	GPT	COMMENTS Currently updating contingency plan plan did not list addresses of emergency coordinators
2. <input checked="" type="checkbox"/> Plan submitted to local emergency response agencies - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.53(b)	GPT	
3. <input checked="" type="checkbox"/> Emergency coordinator on-site or on call - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.55	GPT	
4. <input checked="" type="checkbox"/> Plan describes actions personnel must take in response to fires, explosions or other releases of hazardous waste - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(a)	GPT	
5. <input checked="" type="checkbox"/> Describes arrangements with emergency response agencies - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(c)	GPT	
7. <input type="checkbox"/> Lists names, <u>addresses</u> and phone numbers (home and office) of emergency coordinators - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(d)	GPT	
7. <input checked="" type="checkbox"/> Primary emergency coordinator designated - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(d)	GPT	
8. <input checked="" type="checkbox"/> List emergency equipment including description, location and capabilities - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(e)	GPT	
9. <input checked="" type="checkbox"/> Evacuation plan, if applicable, designates primary and secondary routes and evacuation signal - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(f)	GPT	

J. WASTE OIL

<input checked="" type="checkbox"/> Waste oil is managed properly and not disposed of into the environment - 10 CSR 25-11.010(1)(D)	GOR	COMMENTS
2. <input checked="" type="checkbox"/> Listed hazardous waste mixed with waste oil is handled as a hazardous waste - 10 CSR 25-11.010(1)(C)2.	GOR	
3. <input checked="" type="checkbox"/> Registered as waste oil generator if gen./accum. 220 lb. - 10 CSR 25-11.010(2)(A)	GOR	
4. <input checked="" type="checkbox"/> Written waste oil contract maintained - 10 CSR 25-11.010(4)(C)	GOR	
5. <input checked="" type="checkbox"/> Uses a licensed transporter and receiving facility - 10 CSR 25-11.010(4)	GOR	

K. RESOURCE RECOVERY

<input checked="" type="checkbox"/> RR certification for energy recovery or reclamation of waste oil or hazardous waste on-site - 10 CSR 25-9.020(1)(A)3.	GOR	COMMENTS
2. <input checked="" type="checkbox"/> Still bottoms or RR residues disposed of properly - Section 260.380.1(5) RSMo.	GOR	
3. <input type="checkbox"/> Facility is classified as U, R1 or R2 accurately - 10 CSR 25-9.020(3)(A)	GOR	
4. <input type="checkbox"/> Facility meets the operating conditions of certification - 10 CSR 25-9.020(30)(E)3	GOR	
5. <input type="checkbox"/> Facility has submitted a written request and received approval from the DNR for all changes in operation including closure - 10 CSR 25-9.020(3)(E) 1. and 2.	GOR	

N/A

6.	<input type="checkbox"/> Facility report submitted to DNR quarterly - 10 CSR 25-9.020(3)(E)6. referencing 10 CSR 25-7.264(2)(E)3.	GOR	COMMENTS
7.	<input type="checkbox"/> Facility maintains a written operating record - 10 CSR 25-9.020(3)(E)5. referencing 40 CFR 264.73(b)(1) & (2) as modified by 10 CSR 25-7.264(2)(E)2	GOR	
8.	<input type="checkbox"/> Facility has notified EPA and the state that it qualifies for a small quantity on-site burner exemption or has interim status or a permit if it burns hazardous waste on-site - 10 CSR 25-7.266(1) incorporating 40 CFR 266.108 and 40 CFR 266.103.	GOR	
9.	<input type="checkbox"/> R2 facility uses an adequate sampling and analysis plan to assess incoming shipments - 10 CSR 25-9.020(3)(C)1.	GOR	
10.	<input type="checkbox"/> R2 facility maintains a daily log of manifest number, wastes received, disposition of waste and corresponding sampling data - 10 CSR 25-9.020(3)(C)2.	GOR	
11.	<input type="checkbox"/> R2 facility has a written closure plan which meets 40 CFR 264.112 requirements - 10 CSR 25-9.020(3)(C)3.	GOR	
12.	<input checked="" type="checkbox"/> R2 facility provides financial assurance for closure - 10 CSR 25-9.020(3)(C)4	GOR	

CHECKLIST KEYCheck the ☒ if in compliance.Circle the ☐ if not in compliance and provide comment.

N/A = Not Applicable

A shaded item is a serious deviation from the requirements (Class I violation)

An unshaded item is a significant deviation from the requirements (Class II violation unless conditions warrant Class I)

COMMENTS INCLUDE DISCUSSION OF FACILITY'S WASTE MINIMIZATION PLAN

INSPECTOR'S SIGNATURE

Vickie L. Heberle

DATE

4-20-95

ADEM

**ALABAMA
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**



Fob James, Jr.
Governor

John M. Smith, Director

April 3, 1995

Mailing Address:
PO BOX 301463
MONTGOMERY AL
36130-1463

Physical Address:
1751 Cong. W. L.
Dickinson Drive
Montgomery, AL
36109-2608

(334) 271-7700
FAX 270-5612

Department of Natural Resources
Waste Management Program
Jefferson Building
Post Office Box 176
Jefferson City, Missouri 65102

Dear Sirs:

Re: Lincoln Industrial
One Lincoln Way
St. Louis, MO 63120
USEPA Identification Number MOD 006 269 385

Field Offices:

110 Vulcan Road
Birmingham, AL
35209-4702
(205) 942-6168
FAX 941-1603

400 Well Street, NE
P.O. Box 953
Decatur, AL
35602-0953
(205) 353-1713
FAX 340-9359

2204 Perimeter Road
Mobile, AL
36615-1131
(334) 450-3400
FAX 479-2593

The attached letter describes hazardous waste generated by Lincoln Industrial, St. Louis, MO, that was shipped to Fisher Industrial Service, Inc., Glencoe, AL. The waste was rejected by Fisher because it did not conform to the profile provided by Lincoln Industrial. The drums of waste from Lincoln Industrial had a strong and unusual odor. Lincoln Industrial had profiled the waste as a flammable liquid (toluene/n-methyl pyrrolidone). This indicates the facility may have failed to do a proper solid waste/ hazardous waste determination on the waste.

This matter is being provided for your information and/or action. If I can be of any further assistance, please give me a call at (334) 271-7797.

Sincerely,

Ronald T. Shell
RCRA Compliance Branch
Land Division

RTS/sdm:3#1867/94
Attachment(s)

RECEIVED

APR 12 1995

HAZARDOUS WASTE PROGRAM
MISSOURI DEPARTMENT OF
NATURAL RESOURCES



20

WASTE REJECTION REPORT

ALD981020894
FISHER INDUSTRIAL SERVICE, INC.
P.O. BOX 5410
GLENCOE, AL 35905-0410

DATE OF REJECTION: 01/27/95

GENERATOR EPA ID #: MOD006269385

GENERATOR NAME: LINCOLN INDUSTRIAL (ENGINEERING)

STREET ADDRESS: ONE LINCOLN WAY

CITY/STATE/ZIP: ST. LOUIS, MO 63120

TRANSPORTER EPA ID #: ALD981020894

TRANSPORTER NAME: FISHER INDUSTRIAL SERVICE, INC.

STREET ADDRESS: 402 WEBSTERS CHAPEL RD.

CITY/STATE/ZIP: GLENCOE, AL 35905

DESCRIPTION AND QUANTITY OF WASTE BEING REJECTED:

**WASTE FLAMMABLE SOLIDS, N.O.S. (TOLUENE/N-METHYL PYRROLDONE), 4.1,
UN1325, PG III, RQ: 1000 (DOO1, F003) 2-DRUMS**

**I CERTIFY THAT THE WASTE(S) LISTED ABOVE HAS BEEN REJECTED AND
ACTION TAKEN AS INDICATED.**


AUTHORIZED SIGNATURE

EXPLANATION OF REJECTION AND ACTION TAKEN:

**LINE ITEM 11c - WASTE HAD A STRONG AND UNUSUAL ODOR. THEREFORE THE
WASTE WAS REJECTED BACK TO GENERATOR.**

RECEIVED

FFR 0 2 1995

**ADEM
LABORATORY**

27.085 Lincoln

JOHN ASHCROFT
Governor

G. TRACY MEHAN III
Director



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

St. Louis Regional Office
8460 Watson Road, Suite 217
St. Louis, MO 63119
314-849-1313

Seal
Lincoln
Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks, Recreation,
and Historic Preservation

March 13, 1990

Mr. Roy Long, Plant Engineer
Lincoln Way
St. Louis, MO 63120

Dear Mr. Long:

I have reviewed your facility responses to Letter of Warning, (L.O.W. #89-SL.045). The review indicates that you have taken the corrective actions outlined in the recommendations section of the inspection report attached to the L.O.W. These steps have adequately corrected the violations noted in the report.

Thank you for your cooperation in this matter.

Sincerely,

ST. LOUIS REGIONAL OFFICE

Mike Struckhoff

Mike Struckhoff
Chief, Waste Management Unit

MS/cj

cc: CO - WMP

RECEIVED

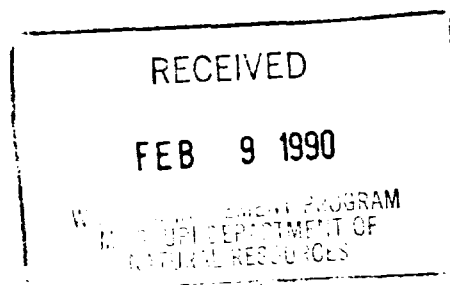
MAR 15 1990



LINCOLN, One Lincoln Way,
St. Louis, Missouri 63120-1578
(314) 679-4200 Telex 44881

February 6, 1990

Mr. Michael Struckhoff
Chief Hazardous Waste Management
Department of Natural Resources
Division of Environmental Quality
8460 Watson Road, Suite 217
St. Louis, Missouri 63119



Mr. Struckhoff:

Please find attached a copy of our hazardous waste training workshop conducted on January 25, 1990. This workshop was conducted by the Metropolitan Manufacturers Association, Mr. William Schuchman presiding.

It is my belief this documentation will meet the requirements of 40 CFR 265.16.

Please direct any questions that you may have to myself or William Schuchman.

Sincerely,

A handwritten signature in cursive script that reads "Roy Long".

Roy Long
Plant Engineer

cc: Sandra Carroll (Waste Management Program)
Bill Kastler
William Schuchman

TRAINING AGENDA

1. Opening Comments
2. Individual employee introduction and work area specifics
3. General explanation of scope and purpose of training
4. Introduction to MSDs
5. Specific Chemistry:

Explanation of substances

Explanation of Regulations

Substance Specific:

Identification by MSDs/container labeling

Relative inplant use

Area specifics

Handling/transfer procedures

Special instructions

Safety requirements

Storage requirements

Mixtures/reactives

Hazards: short term/long term

6. Protective equipment
7. Identification of spills/volumes
8. Everyday common sense
9. Your part in the Contingency and Emergency Plan
10. Your responsibilities to your employer
11. Your supervisors responsibilities
12. New materials/substances
13. Questions/Signoff by each employee in attendance

copyright 1990 @ Metropolitan Manufacturers' Association

EMPLOYEE CHEMICAL SUBSTANCE/RESPONSE WORKSHOP

I, the undersigned, hereby state that on this date I have participated in a workshop designed to inform me of the hazards related to the use and handling of chemical substances and/or materials and their byproducts (hereafter substances) in my workplace. As a result of this workshop I do indicate an understanding of the hazardous materials and waste chemical properties, monitoring, detection, and the physical and health hazards associated with potential exposures. I have been informed as to procedures and protocol relative to the use and maintenance of protective equipment and devices. I have also received an explanation of the physical properties of substances and the regulation of certain substances. I have been informed as to substance storage, handling, safety, mixtures/reactives, spills, implant usages, identification and labeling. The company Contingency and Emergency Plan has also been explained to me. This information has been provided me verbally and all my questions answered through a open question session. I also understand the procedures to be implemented, both my me and by the company, in the event of any emergency incident. I am aware that all Right To Know information is available to me.

NAME: I.D. NUMBER:

William Lee
Betty McCant
Tom Brenner
Arthur James
William L. Adams

Supervisor verifying above signature

BOY LONG
please print

Roy Long
signature

title

Plant Engineer

1-25-90

date

ANNUAL EMPLOYEE TRAINING SIGN IN ROSTER

NAME	DEPARTMENT	SHIFT

Black Joe R.S. 34 1

Betty McCant RF 45 1

Don't Name R# 31 1

Sethur James R# 34 1

Willie T. H. D. R. 15 1

Tom Brenne R# 17 1

1-25-90 / 8:AM
date/time

NOTE: a supervisor in attendance must certify each employees signature by affixing the proctor supervisors initials immediately to the right of each employees signature.

MMA/0190-10



LINCOLN, One Lincoln Way.
St. Louis, Missouri 63120-1578
(314) 679-4200 Telex 44881

December 18, 1989

DEC 19 1989
SLRO

Mr. Mike Struckhoff
Chief Hazardous Waste Management
Department of Natural Resources
Division of Environmental Quality
8460 Watson Rd. Suite 217
St. Louis, MO 63119

Mr. Struckhoff:

Please find attached the paper work related to the clean-up of oil contaminated soil here at Lincoln. Should you have any questions, please contact me.

Sincerely,

A handwritten signature in dark ink, appearing to read "Roy".

Roy Long
Plant Engineer

Attachment

No. 9880**AUTHORIZATION FOR EXPENDITURES**FOR DEPARTMENT 5130/5131/5232DATE ISSUED 05/01/89ISSUED TO DEPARTMENT PurchasingACCOUNT NO. 26-600-000

CHECK ONE:

S. W. O. NO. 10010 J☐ CAPITAL ☐ EXPERIMENTAL PROJECTS

SLRO

ESTIMATED COMPLETION DATE _____

☐ TOOLING ☐ MAINTENANCE AND REPAIRSBUDGETED: YES ☐ NO ☒☐ REPLACEMENTS OF _____COVERED BY A.R.: YES ☐ NO ☐OTHERS (DESCRIBE) Soil disposal and replacement

A. R. NO. _____

DETAILED DESCRIPTION	ESTIMATED COST				
	PURCHASE	IN HOUSE MATERIAL	LABOR	FRINGE	TOTAL
Analyze, excavate, transport and dispose of oil contaminated soil located on the south west corner of our property	8442				8442
					EST
Replace soil and rocks	525				525
TOTAL ESTIMATED EXPENDITURE	8942				8942

REASON FOR REQUEST (USE ANOTHER PAGE FOR ADDITIONAL SPACE) Oil has been
allowed to saturate the rocks and soil in this area. A clean-up is
necessary to avoid possible problems in the future.

Roy Long Roy Long05/01/89 SLR

\$ 500 to \$2500 REQUESTED BY _____

DATE _____

\$2500 to \$5000 APPROVED BY _____

DIVISION HEAD

DATE 6/7/89

\$5000 and UP APPROVED BY _____

PRESIDENT

DATE 6/2/89

EACH AUTHORIZATION FOR EXPENDITURES REQUIRES AN ACCOUNT NUMBER WHICH SHOULD BE WITHIN REQUESTOR OR APPROVER AREA OF RESPONSIBILITY.

NOTE - CAPITAL ADDITIONS OR REPLACEMENTS ARE TO BE REFERRED TO DIVISION HEAD FOR APPROVAL REGARDLESS OF AMOUNT.



HERITAGE REMEDIATION/ENGINEERING, INC.

183 McDonnell Blvd.
St. Louis, MO 63042

Phone 314/521-3600
Fax 314/731-3922

May 23, 1989

Mr. Roy Long
Lincoln Engineers
4010 Longfellow
St. Louis, MO 63120-1578

RECEIVED
DEC 19 1989

SLRO

RE: HR/E SI #S837
HR/E Proposal #890396

Dear Mr. Long:

Heritage Remediation/Engineering, Inc. (HR/E) is pleased to provide the following proposals for the transformer and contaminated soil projects at your St. Louis, Missouri facility.

TRANSFORMER PROJECT

SCOPE OF WORK

Transformers included in this Scope of Work are described as follows:

- * 3 - 500 KVA Wagner transformers.

Each has a total weight of 3,980 pounds and dimensions of 4'x4'x7'. Total gallons in each is assumed to be 115 gallons.

Based on discussions with Mr. Long, HR/E assumes two transformers contain oil with no detectable PCB levels, one has PCB's at less than 50 ppm.

HR/E will perform the following tasks:

- 1) Load and secure transformers to truck using all precautions and personal protective equipment needed to complete job in a safe manner.
- 2) Arrangements will be made for transportation and disposal of the transformers to a TSCA approved facility. Certificates of destruction will be made available to Lincoln Engineers.

HERITAGE REMEDIATION/ENGINEERING, INC.

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DEC 19 1989

CONTAMINATED SOIL AND ABOVE GROUND TANK PROJECT

SLRO

SCOPE OF WORK

Based on a site visit and discussions with Mr. Long, the areas involved in the Scope of Work are as follows:

- * A contaminated area of gravel/soil with dimensions of approximately 40 feet by 40 feet and of unknown depth. HR/E plans to give prices for removal of first 6 inches and then unit costs for excavation within this area. Agent of contamination in this area is assumed to be waste oil/cutting oil.
- * One approximately 1,000 gallon waste oil tank with 2 feet of oil/sludge remaining (approximately 530 gallons).

Tasks included in the Scope of Work:

- 1) Sampling and wastestream approval. Representative samples from both the contaminated soil area and the waste oil tank will be removed and submitted to approved disposal facilities for wastestream approval analysis.
- 2) Upon acceptance of materials by these facilities, HR/E will mobilize personnel and equipment to excavate and load contaminated soil from the previously described area. The cost of this phase will be dependent on the depth of contamination. Costs will be given for first 6 inches of excavation and then unit prices for additional excavation. Samples can be taken for soil analysis at the direction of Lincoln Engineers.
- 3) HR/E will backfill area with clean gravel.
- 4) HR/E will arrange for transportation and disposal of contaminated gravel/soil.
- 5) The 1,000 gallon tank will be emptied of any materials, cleaned with a high pressure washer, purged of vapors and dismantled on site.
- 6) Tank will be disposed of with a reputable scrap dealer.
- 7) HR/E will transport and dispose of tank contents at an approved facility.

RECEIVED
DEC 19 1989

ASSUMPTIONS

SLRO

- 1) HR/E will have control and complete access to project areas.
- 2) Lincoln Engineers is responsible for locating underground utilities prior to any excavation.

COSTS

Transformer Project

Loading, Securing, Transportation and Disposal.....\$7,450.00

Soil Excavation and Tank Project

Soil and Waste Oil Sampling and Wastestream Approval.....\$560.00

Soil Excavation:

All Labor, Materials, and Backfill.....\$4,850.00

(first 6" of excavation)
(each additional yd³).....\$30.00

Tank Cleaning, Dismantling, and Tank Disposal:

All Labor and Materials.....\$2,230.00

Soil Disposal.....\$18.00/yd³

Soil Transportation.....\$250.00/14 yd³ load

Waste Oil Disposal.....\$85.00/drum

Waste Oil Transportation.....\$550.00/load of up to 12 drums

Additional Backfill in Place.....\$25.00/ton

Soil Analysis (approximately).....\$600.00/sample

All disposal and transportation prices are estimates only and firm prices can only be quoted upon analysis of the material and acceptance of the material by our disposal facility.

All HR/E employees undergo rigorous training and annual physicals. Additionally, all of our employees are trained in the proper use of respirator protection and personal protection equipment. Our in-house safety and training program conforms to OSHA and NIOSH regulations including those governing respirator fit tests.

HR/E is fully insured through its broker which can provide a certificate of insurance upon request. Our underwriters have been fully informed as to the exact services we provide as an environmental contractor. As such, our insurance policy specifically covers the services outlined in this proposal.

JOHN ASHCROFT
Governor

G. TRACY MEHAN III
Director



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

P.O. Box 176
Jefferson City, MO 65102

Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks, Recreation,
and Historic Preservation

July 26, 1989

Mr. Mitch Stepro
Browning-Ferris Ind.
324 Fee Fee Road
St. Louis, MO 63043

RECEIVED
DEC 19 1989

SLRO

Dear Mr. Stepro:

RE: Special Waste Disposal, St. Louis County SLF, Operating Permit No. 118914.

This is in reply to your request received July 13, 1989 to dispose of a special waste generated by Lincoln Engineers. The waste is described as soil contaminated with cutting oil. The request was for the one time disposal of three hundred (300) cubic yards.

St. Louis County Sanitary Landfill is approved to accept this waste. The department's review of your special waste disposal request did not investigate this waste's potential for being a regulated hazardous waste beyond that of a review of the data submitted by Heritage Remediation for Lincoln Engineers. The data reviewed indicates that this waste is not regulated as a hazardous waste per 10 CSR 25-4.261. The approved method of disposal is codisposal with municipal wastes on the active fill face.

Note that the special waste request form has been revised. Enclosed is a copy of the revised form. Please use this new version of the form for any future requests.

This approval is not to be construed as compliance with any existing local disposal requirements. If there are questions, I may be contacted at (314) 751-3176.

Sincerely,

DIVISION OF ENVIRONMENTAL QUALITY

Susanne L. Ranard

Susanne L. Ranard
Environmental Engineer
Waste Management Program

SLR:lh

Enclosure

cc: Mr. Roy Long, Lincoln Engineers
Mr. Michael Dixon, Heritage Remediation
St. Louis Regional Office

JOHN ASHCROFT
Governor

G. TRACY MEHAN III
Director



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

P.O. Box 176
Jefferson City, MO 65102

Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks, Recreation,
and Historic Preservation

July 26, 1989

DEC 19 1989

SLRO

Mr. Roy Long
Lincoln Engineers
4010 Goodfellow
St. Louis, MO 63120

Dear Mr. Long:

RE: Special Waste Disposal, St. Louis County SLF,
Operating Permit No. 118914.

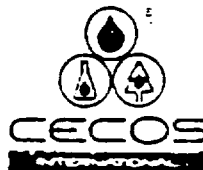
This is in response to the special waste disposal request received by the Waste Management Program (WMP) July 13, 1989 regarding the disposal of soil contaminated with cutting oil. The disposal request has been approved per the enclosed letter.

Approval to dispose of this waste at St. Louis County Sanitary Landfill is contingent upon it not being a hazardous waste per 10 CSR 25-4.261. WMP's review of this disposal request did not extend beyond a review of data submitted by Heritage Remediation for Lincoln Engineers. This data indicates that this waste is not a hazardous waste as per 10 CSR 25-4.261. Ultimate responsibility, though, of identifying a waste as hazardous resides with the waste generator. If this waste is a hazardous waste, Lincoln Engineers is required to manage it in accordance with Missouri Hazardous Waste Management Law, Rules and Regulations.

This approval is not to be construed as compliance with any existing local requirements. For disposal of special waste in St. Louis County, please contact the St. Louis County Department of Community Health and Medical Care, Environmental Health Division, 121 South Meramec (7th Floor), Clayton, Missouri 63105, (314) 854-6249.

WASTE CHARACTERIZATION DATA

Exhibit A



PRODUCT CODE

WCD NUMBER

REVIEWED BY

BFI VOUCHER CODE 9 1989

IMPORTANT: PLEASE READ INSTRUCTIONS BEFORE COMPLETING THIS FORM

1. GENERAL INFORMATION:

a) Generator's Name: Lincoln Engineers b) EPA Generator No: MD0006269385
State Registration No: _____
c) Generating Facility Complete Address: 4010 Good Fellow St. Louis MO 63120-1578
d) Authorized Company Representative: Raymond Michael Dixon Title: Env. Spec.
e) Phone Number: 314 521 3600 After Hours Phone Number: 314 521 3600
f) Emergency Contact: Michael Dixon Title: Env. Spec. Phone: 314 521 3600
g) General Description of The Waste: oil contaminated soil
h) Process Generating Waste: over fill + runoff of oil storage tank.

2. WASTE PROPERTIES @ 25°C:

a) Physical State: ☒ Solid ☐ Powder ☐ Liquid ☐ Semi-solid (sludge) or
[] Mixture—Describe _____ Viscosity: [] Low [] Medium [] High
b) Phases/Layers: ☒ Single ☐ Bilayered ☐ Multilayered
Percentage Volume Each Layer: Top _____%, Middle _____%, Bottom _____%,
c) Density: 21 [] Lbs./gal. [] Lbs./yd.³ [] g/cc. [] Other _____
d) Odor: [] None ☒ Mild or [] Strong [] — Describe _____
e) Vapor Pressure (in mm of Hg): _____ (f) Color(s): _____
g) pH: _____ (h) Solubility (g./100 g. H₂O): _____
i) Flash Point: 2200 ☒ °F [] °C [] Open Cup [] Closed Cup

3. REACTIVITY:

Hydrophobic	[] Yes <input checked="" type="checkbox"/> No	Autopolymerizable	[] Yes <input checked="" type="checkbox"/> No	Shock Sensitive	[] Yes <input checked="" type="checkbox"/> No
Acid Reactive	[] Yes <input checked="" type="checkbox"/> No	Alkaline Reactive	[] Yes <input checked="" type="checkbox"/> No	Pyrophoric	[] Yes <input checked="" type="checkbox"/> No
Explosive	[] Yes <input checked="" type="checkbox"/> No	Thermally Sensitive	[] Yes <input checked="" type="checkbox"/> No		

4. THIS WASTE CONTAINS:

Biological Materials	[] Yes <input checked="" type="checkbox"/> No	Pathogens	[] Yes <input checked="" type="checkbox"/> No	Pesticides	[] Yes <input checked="" type="checkbox"/> No
Etiological Agents	[] Yes <input checked="" type="checkbox"/> No	Dioxins	[] Yes <input checked="" type="checkbox"/> No	Oils	<input checked="" type="checkbox"/> Yes [] No
Free Cyanide	[] Yes <input checked="" type="checkbox"/> No	Free Sulfide	[] Yes <input checked="" type="checkbox"/> No	Free Ammonia	[] Yes <input checked="" type="checkbox"/> No
Radioactive Materials	[] Yes <input checked="" type="checkbox"/> No	Free Liquids	[] Yes <input checked="" type="checkbox"/> No	Absorbents	[] Yes <input checked="" type="checkbox"/> No
OSHA Substances	[] Yes <input checked="" type="checkbox"/> No	PCBs: (circle one) <u>A</u> B C D			

If yes, specify type (if applicable) and concentration in the waste composition, Section 5.

5. COMPLETE WASTE COMPOSITION:

ORGANIC

INORGANIC

cutting oil 12%
soil 99%

6. Is this waste a "Hazardous Waste" as defined by regulations of the U.S. Environmental Protection Agency pursuant to 40 CFR 261 of the Resource Conservation and Recovery Act? No
Is this a "Hazardous Waste" as defined by State or Local Regulation? No
7. Is a sample included? ☒ Yes [] No
8. Anticipated Volume: ~300 [] Gallons [] Tons ☒ Cubic Yards [] Other _____
Per: [] Day [] Week [] Month [] Year, or ☒ Other 1 time only
To be transported in: ☒ Bulk [] CECO-PAK [] Drums (type/size) _____

APPLICATION FOR DISPOSAL OF SPECIAL WASTE

Initial _____ Renewal _____

Date _____

DEC 19 1989

SLRO

TO: St. Louis County Department
of Community Health and Medical Care
Waste Management
801 South Brentwood Boulevard
Clayton, MO 63105

The undersigned are applying for authorization to dispose of special waste in St. Louis County as provided by SLCRO Chapter 607, Section 860, 1987.

Special wastes are nonliquid wastes including treated infectious waste which are determined by MDNR, USEPA, and/or the St. Louis County Health Department to be nonhazardous or excluded from State hazardous waste requirements but requiring special handling. Asbestos waste is excluded as special waste under SLCRO Chapter 607.

I. General Information, Generator

1. Owner Lincoln Engineers
2. Contact Person ROY C. Long
3. Company Lincoln Engineers
4. Address 4010 Good Fellow
5. City, State, Zip St. Louis MO 63120-1578
6. Telephone (314) 679-4370
Area Code

II. Waste Description

Please attach a completed copy of the Missouri Department of Natural Resources Special Waste Disposal Request and analyses performed (not applicable to treated infectious waste) if this is an initial application. A waste sample may be requested.

1. Waste Description Oil contaminated soil

ST. LOUIS CO PERMIT # 262S-D89Q

Special Waste Permit Application
Page 2 of 4

2. If this is a renewal application, has the waste composition/status or physical properties change since the date of the last application? Yes_____ No_____ If yes, please describe. A waste sample may be requested.

Waste Description Change _____

3. For treated infectious waste, please describe the method(s) of treatment or neutralization: (i.e., autoclaving, incineration, etc.): _____

4. For treated infectious waste, please describe the quality control safeguard(s) used including indicator(s): (i.e., time/temp. charts, bacillus stearothermophilus spore assay, etc.): _____

III. Generation Rate:

1. Waste Type or Name Oil Contaminated Soil
2. Continuous _____ cu. yds. per month
3. Periodic _____ cu. yds. per _____
4. One-Time Only ~ 300 cu yds. amount

IV. Transportation

1. Name of Waste Hauler BGS/mtn
2. Contact Person Ron Gjerstad
3. Phone Number (314) 241-9600
Area Code

4. Is the Hauling Vehicle/Mobile Container permitted by Waste Management ? Yes X No
5. State License Number (s) or Vehicle Identification Number(s)

504SW - 505W - etc..

6. Type of Vehicle Body Dump

7. Name of Bonding Agency *Hartford*

8. Bond Number 53542144

9. Bond Expiration Date 1/6/90

10. Waste Spillproof Technique (Describe precautions taken to prevent spill and/or blowing of litter) Cover back of Truck with
Tarp

V. Disposal

Waste loads will be individually recorded at the Disposal Facility. (Copies of Time/Temp. charts, bacteria spore assay(s), or other quality control indicators for treated infectious waste may be requested by the St. Louis County Health Department, Waste Management.)

1. Name of Disposal Facility _____
2. Contact Person _____
3. Disposal Technique _____

VI. Additional Pertinent Information

VII. Certification

I, the undersigned, submit this request to dispose of the named waste under SLCRO Chapter 607, 1987, and certify that the waste named herein and as shown is not a hazardous waste as defined by the Missouri Waste Management Law and Rules, and that any infectious waste is completely neutralized, and that the information supplied by me is correct.

Michael W. Dixon Date 7/6/89
Signature of waste generator
or authorized representative

Michael W. Dixon ENV. Spec. Date 7/6/89
Print Name and Title

VIII. Application Fee: Please remit \$50.00
Approved Application is effective until expiration date.

FOR WASTE MANAGEMENT OFFICE USE ONLY

_____ Approved _____ Expiration Date
_____ Disapproved

Other Conditions: _____

_____ Date _____
Signature of Director of Health or Authorized Agent

Print Name and Title

OFFICE USE ONLY
CLASS, CODEMISSOURI DEPARTMENT OF NATURAL RESOURCES
SPECIAL WASTE DISPOSAL REQUEST
(for non-hazardous wastes)OFFICE USE ONLY
GENERATOR I.D. NO.
FILE IDENTIFICATION

I. GENERAL INFORMATION

DISPOSAL FACILITY		WASTE GENERATOR
Name:		Lincoln Engineers
Address:		4010 Goodfellow
City, State, Zip:		St. Louis MO 63120-1578
Telephone Number:		314 679 4370
Permit Number:		
Contact Person:		

II. WASTE CHARACTERIZATION (To be completed by Generator)

- A. Name of waste Oil contaminated Soil
- B. Description of generation process Oil overflow from storage tank
- C. (Check One): (1) ☒ Solid, (2) Sludge (20% solids), (3) Slurry (20% solids), (4) Liquid (5% solids),
(5) Other - specify _____ pH _____ % Solids by weight _____
Flash Point > 200 using Pensky-Martins Closed Cup (ASTM D-93-77) or Setflash Closed Tester (ASTM Standard D-3278-73)
Specific gravity > 1 Pumpable: Yes _____ No ☒
Odor: Yes ☒ No _____ Free Fluids: Yes _____ No ☒
- D. Was the waste ever classified or listed as hazardous? NO If so the previous No. waste I.D. number was _____
- E. Chemical composition (attach any additional analysis)

Major Components	Wt. %		Wt. %
1. <u>Soil</u>	<u>99%</u>	4.	
2. <u>Oil (Cutting)</u>	<u>1%</u>	5.	
3.		6.	

F. Source of chemical data _____

III. GENERATION RATE (To be completed by Generator)

Waste Generation is: Check One

- A. Continual Average generation rate per month _____
- B. Intermittent Rate _____
- C. ☒ One Time Only Quantity ~300
- D. If A or B, indicate amount for immediate disposal _____
- E. Units (Circle One): Tons Gals Pounds Cubic Yards Empty Containers _____ (Give no. & size)

IV. TRANSPORTATION (To be completed by Generator or Landfill Operator)

- A. Containers used for transportation
(Check one): (1) ☒ Bulk (cubic yards), (2) Metal drums (gal), (3) Cases, cartons (size, number/case),
(4) Fiber drums (gal), (5) Other - specify _____
- B. Type of vehicle:
(1) Tractor-trailer (2) Roll-off/Lifter, (3) ☒ Dump Truck, (4) Other _____

V. DISPOSAL TECHNIQUES (To be completed by Landfill Operator).

- A. Separate trench burial.
1. Location on landfill site _____
2. Trench design previously approved by DNR? _____
3. Trench design approval being requested? _____
- B. Codisposal with municipal waste on active fill face
1. Average daily quantity of municipal solid waste _____ tons or cubic yards.
2. Special waste to be unloaded at: Toe of working face _____
Top of working face _____
- C. Other disposal Procedures - specify _____

VI. HANDLING PROCEDURES (To be completed by Generator)

- Safety precautions during handling: Provide handling information supplied by product manufacturer, waste generator or from other sources describing the necessary measures that should be taken to protect personal safety, to control dusting or to insure fixed placement of the waste. This should include a description of materials not compatible with this waste. *NO Special precautions necessary. Normal Safety measures required*

VII. CERTIFICATION (To be completed by Generator and Landfill Operator)

I, the undersigned, submit this request to dispose of the named waste and certify that the information supplied by me herein is correct. I understand approval to dispose of the waste may be suspended if false information has been submitted or if the disposal operation is not carried out in a proper and legal manner.

Signature of landfill operator or authorized representative

Date

Print Name

I, the undersigned, submit this request to dispose of the named waste and certify that the waste named herein to the best of my knowledge is not a hazardous waste as defined by the Missouri Waste Management Law and Rules and that the information supplied by me is correct.

Michael W. Dixon

Signature of waste generator or authorized representative

7/6/89
Date

Michael W. Dixon
Print Name

Additional comments:

Send to: MISSOURI DEPARTMENT OF NATURAL RESOURCES
Waste Management Program
P.O. Box 1368
Jefferson City, Missouri 65102

APPLICATION FOR DISPOSAL OF SPECIAL WASTE

Initial _____ Renewal _____

Date _____

FILED
TO: St. Louis County Department
of Community Health and Medical Care
Waste Management
801 South Brentwood Boulevard
Clayton, MO 63105

The undersigned are applying for authorization to dispose of special waste in St. Louis County as provided by SLCRO Chapter 607, Section 860, 1987.

Special wastes are nonliquid wastes including treated infectious waste which are determined by MDNR, USEPA, and/or the St. Louis County Health Department to be nonhazardous or excluded from State hazardous waste requirements but requiring special handling. Asbestos waste is excluded as special waste under SLCRO Chapter 607.

I. General Information, Generator

1. Owner Lincoln Engineers
2. Contact Person ROY C. Long
3. Company Lincoln Engineers
4. Address 4010 Good Fellow
5. City, State, Zip St. Louis MO 63120-1578
6. Telephone (314) 679-4370
Area Code

II. Waste Description

Please attach a completed copy of the Missouri Department of Natural Resources Special Waste Disposal Request and analyses performed (not applicable to treated infectious waste) if this is an initial application. A waste sample may be requested.

1. Waste Description Oil contaminated soil

ST. LOUIS CO PERMIT # 262S-D89Q

2. If this is a renewal application, has the waste composition/status or physical properties change since the date of the last application? Yes _____ No _____ If yes, please describe. A waste sample may be requested.

Waste Description Change _____

3. For treated infectious waste, please describe the method(s) of treatment or neutralization: (i.e., autoclaving, incineration, etc.): _____

4. For treated infectious waste, please describe the quality control safeguard(s) used including indicator(s): (i.e., time/temp. charts, bacillus stearothermophilus spore assay, etc.): _____

III. Generation Rate:

1. Waste Type or Name Oil contaminated Soil
2. Continuous _____ cu. yds. per month
3. Periodic _____ cu. yds. per _____
4. One-Time Only ~ 300 cu yds. amount

IV. Transportation

1. Name of Waste Hauler BGS/mtn
2. Contact Person Ron Gjerstad
3. Phone Number (314) 241-9600
Area Code

4. Is the Hauling Vehicle/Mobile Container permitted by Waste Management ? Yes X No
5. State License Number (s) or Vehicle Identification Number(s)
504SW - 505W - etc..
6. Type of Vehicle Body Dump
7. Name of Bonding Agency Heartford
8. Bond Number 53542144
9. Bond Expiration Date 1/6/90
10. Waste Spillproof Technique (Describe precautions taken to prevent spill and/or blowing of litter) Cover back of Truck with Tarp

V. Disposal

Waste loads will be individually recorded at the Disposal Facility. (Copies of Time/Temp. charts, bacteria spore assay(s), or other quality control indicators for treated infectious waste may be requested by the St. Louis County Health Department, Waste Management.)

1. Name of Disposal Facility _____
2. Contact Person _____
3. Disposal Technique _____
- _____
- _____
- _____

VI. Additional Pertinent Information

VII. Certification

I, the undersigned, submit this request to dispose of the named waste under SLCRO Chapter 607, 1987, and certify that the waste named herein and as shown is not a hazardous waste as defined by the Missouri Waste Management Law and Rules, and that any infectious waste is completely neutralized, and that the information supplied by me is correct.

Michael W. Dixon Date 7/6/89
Signature of waste generator
or authorized representative

Michael W. Dixon ENV. Spec. Date 7/6/89
Print Name and Title

VIII. Application Fee: Please remit \$30.00
Approved Application is effective until expiration date.

FOR WASTE MANAGEMENT OFFICE USE ONLY

_____ Approved _____ Expiration Date
_____ Disapproved

Other Conditions: _____

Signature of Director of Health or Authorized Agent Date _____

Print Name and Title

WASTE CHARACTERIZATION DATA

Exhibit A



PRODUCT CODE _____

WCD NUMBER _____

REVIEWED BY _____

BFI WASTE CODE _____

IMPORTANT: PLEASE READ INSTRUCTIONS BEFORE COMPLETING THIS FORM**1. GENERAL INFORMATION:**

a) Generator's Name: Lincoln Engineers b) EPA Generator No: MD0006269385
State Registration No: _____
c) Generating Facility Complete Address: 4010 Goodfellow St. Louis MO 6320-1578
d) Authorized Company Representative: Mr. Michael Dixon Title: Env. Spec.
e) Phone Number: 314 521 3600 After Hours Phone Number: 314 521 3600
f) Emergency Contact: Michael Dixon Title: Env. Spec. Phone: 314 521 3600
g) General Description of The Waste: oil contaminated soil
h) Process Generating Waste: Over fill + runoff of oil storage tank.

2. WASTE PROPERTIES @ 25°C:

a) Physical State: ☒ Solid ☐ Powder ☐ Liquid ☐ Semi-solid (sludge) or
[] Mixture—Describe _____ Viscosity: [] Low [] Medium [] High
b) Phases/Layers: ☒ Single ☐ Bilayered ☐ Multilayered
Percentage Volume Each Layer: Top _____%, Middle _____%, Bottom _____%,
c) Density: 21 [] Lbs./gal. [] Lbs./yd.³ [] g/cc. [] Other _____
d) Odor: [] None ☒ Mild or [] Strong [] — Describe _____
e) Vapor Pressure (in mm of Hg): _____ (f) Color(s): _____
g) pH: _____ (h) Solubility (g/100 g. H₂O): _____
i) Flash Point: >200 ☒ °F [] °C [] Open Cup [] Closed Cup

3. REACTIVITY:

Hydrophoric	[] Yes <input checked="" type="checkbox"/> No	Autopolymerizable	[] Yes <input checked="" type="checkbox"/> No	Shock Sensitive	[] Yes <input checked="" type="checkbox"/> No
Acid Reactive	[] Yes <input checked="" type="checkbox"/> No	Alkaline Reactive	[] Yes <input checked="" type="checkbox"/> No	Pyrophoric	[] Yes <input checked="" type="checkbox"/> No
Explosive	[] Yes <input checked="" type="checkbox"/> No	Thermally Sensitive	[] Yes <input checked="" type="checkbox"/> No		

4. THIS WASTE CONTAINS:

Biological Materials	[] Yes <input checked="" type="checkbox"/> No	Pathogens	[] Yes <input checked="" type="checkbox"/> No	Pesticides	[] Yes <input checked="" type="checkbox"/> No
Etiological Agents	[] Yes <input checked="" type="checkbox"/> No	Dioxins	[] Yes <input checked="" type="checkbox"/> No	Oils	<input checked="" type="checkbox"/> Yes [] No
Free Cyanide	[] Yes <input checked="" type="checkbox"/> No	Free Sulfide	[] Yes <input checked="" type="checkbox"/> No	Free Ammonia	[] Yes <input checked="" type="checkbox"/> No
Radioactive Materials	[] Yes <input checked="" type="checkbox"/> No	Free Liquids	[] Yes <input checked="" type="checkbox"/> No	Absorbents	[] Yes <input checked="" type="checkbox"/> No
OSHA Substances	[] Yes <input checked="" type="checkbox"/> No	PCBs: (circle one) <u>A</u> B C D			

If yes, specify type (if applicable) and concentration in the waste composition, Section 5.

5. COMPLETE WASTE COMPOSITION:ORGANICINORGANIC

cutting oil 88% 1%
soil 99%

6. Is this waste a "Hazardous Waste" as defined by regulations of the U.S. Environmental Protection Agency pursuant to 40 CFR 261 of the Resource Conservation and Recovery Act? NoIs this a "Hazardous Waste" as defined by State or Local Regulation? No7. Is a sample included? ☒ Yes [] No8. Anticipated Volume: 2300 [] Gallons [] Tons ☒ Cubic Yards [] Other _____Per: [] Day [] Week [] Month [] Year, or ☒ Other 1 time onlyTo be transported in: ☒ Bulk [] CECO-PAK [] Drums (type/size) _____



LINCOLN, One Lincoln Way,
St. Louis, Missouri 63120-1578
(314) 679-4200 Telex 44881

November 28, 1989

Mr. Mike Struckhoff
Chief-Hazardous Waste Management
Missouri Department of Natural Resources
Division of Environmental Quality
8460 Watson Road - Suite 217
St. Louis, Missouri 63119

RECEIVED

NOV 30 1989

Mr. Struckhoff:

This memo is a follow-up on our progress to date on items you found unsatisfactory during your inspection of our facility on May 25, 1989, and May 31, 1989.

To address violation (4), contingency plan and violation (5) hazardous waste training, we have arranged with Mr. Bill Schuchman, Metropolitan Manufacturers Association, to meet on November 28, 1989, and finalize our obligations. Presently the target date of compliance on both violations is January 1, 1990.

Violation (6) waste oil disposed of into the environment has been addressed and is complete. Enclosed please find a copy of an invoice from Heritage Remediation dated September 25, 1989, for the disposal of forty-two cubic yards of soil.

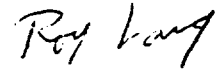
To meet your recommendation #8 please find enclosed a copy of lab report 89-4297 dated June 26, 1989.

Continued.....

Mr. Mike Struckhoff
Page 2.

Recommendation #9 requests proper disposal of xylene cleaning solvent. Presently the xylene is stored in Department of Transportation approved drums and disposal is not anticipated in the near future. If this situation would change, every necessary step would be taken for proper disposal meeting all federal, state and /or local laws.

Sincerely,

A handwritten signature in cursive script that reads "Roy Long".

Roy Long
Plant Engineer

cc: Ms. Sandra Carroll
Mr. Bill Schuchman



LINCOLN ENGINEERS
One Lincoln Way
St. Louis, MO 63120
Accounts Payable

St. Louis Division
183 McDonnell Blvd.
St. Louis, MO 63042
(314) 521-3600

2141
100105
34705

NE 202287028709-25-89	
Invoice	Date

Cust. 13678

TERMS: Payable net 10 days. 1½% per month — 18% per annum.

15491

YOUR ORDER NUMBER	SHIPPING DATE	XXXXX	JOB# 8946009
-------------------	---------------	-------	--------------

DESCRIPTION

TOTAL QUANTITY

UNIT PRICE

AMOUNT

LOCATION OF WORK: PROGRESSIVE BILLING

Soil Excavation and Tank Project.
Progressive Billing. Waste Oil
Transportation and Disposal to be billed
at a later date.

DATE OF SERVICE: 21 SEP 1989

Fix Price Bid Labor, Materials, Backfil
Soil Disposal
Soil Transportation

1	\$4,850.00	\$4,850.00
42 Yd. \$	18.00 \$	756.00
3 Load\$	250.00 \$	750.00

NIPA-DIEH
317-243-6764
EXT 324

ENTERED

Please Remit To: P.O. Box 66079 Indianapolis, Indiana 46266

AMOUNT DUE

\$ 6,356.00

St. Louis Testing Laboratories, Inc.



2810 CLARK AVENUE
ST. LOUIS, MO 63103-2574
314-531-8080
FAX 314-531-8085

*Chemical, Metallurgical, Physical, Non-Destructive,
Spectrographic, Environmental Testing & Analyses
Investigations, Inspections, Field Services*



June 26, 1989
Report No. 89-4297
Lab No. 89C1608
P.O. No. 14187

LINCOLN
One Lincoln Way
St. Louis, Missouri 63120

Attention: Roy Long

REPORT OF TESTS

SAMPLE ID: One (1) sample identified as Waste Oil Tank
South Yard 6-1-89

RESULTS:

Flash Point, °F ---	> 210
Chloride, % -----	0.68

Identification of tested specimen provided by the customer.

Respectfully submitted,

Donavon DeRousse
Donavon DeRousse
Chemistry Department

mmb

JOHN ASHCROFT
Governor

G. TRACY MEHAN III
Director



Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks, Recreation,
and Historic Preservation

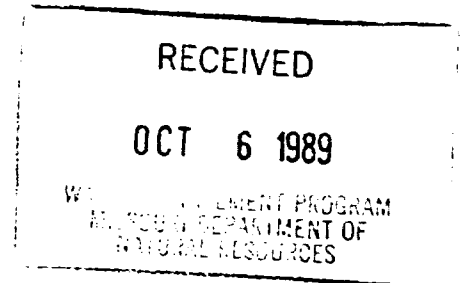
STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES
MEMORANDUM

October 5, 1989

TO: Sandra Carroll, Chief, Hazardous Waste
Enforcement Unit, Waste Management Program

FROM: Mike Struckhoff, Chief, Hazardous Waste
Management Unit, St. Louis Regional Office

TOPIC: Inspection of Lincoln - McNeil Corp.



This is a response to the questions posed in your September 11, 1989 memorandum.

1. Lincoln does not have a waste oil contract with a transporter. Lincoln has been using manifests and disposing of the cutting oil as a hazardous waste. I requested in my report that an analysis of the cutting oil be completed. If the analysis does not show the oil to be a hazardous waste because of total halogens then Lincoln does not need to manifest the oil. I will then request a waste oil contract. I will send you a copy of the analysis as soon as I receive it.
2. I have attached both expired and renewed permits for the zinc plating waste and paint sludge from the Illinois Environmental Protection Agency. I have also attached the analysis for the new permits. I was not able to obtain analysis for the expired permits during the inspection.

The zinc plating waste was from the treatment of wastewaters from zinc plating of carbon steel.

The EPA guidance document that you made reference to was not attached. Please send a copy of this document.

3. Lincoln has a paint line and paints some of the equipment that it manufactures. During the inspection no painting was being done and no waste was present that indicated that much painting had been done recently.

I called Mr. Ron Long on September 26, 1989, and he sent me painting records. The attached records indicate that from July 20, 1989 to August 17, 1989, Lincoln used about fifty-eight (58) gallons of paint to paint equipment.

Xylene is not presently used to clean equipment at the facility. Xylene had been used to clean the spray tips until October, 1988. The tips were cleaned in open cans and the xylene eventually evaporated. I explained during the inspection that evaporation was not an allowed form of disposal. I did not find any evidence that Lincoln was using xylene at the time of the inspection.

There is the possibility that prior to October, 1988, some xylene did get added to the nonhazardous paint sludge since no xylene waste was manifested off-site. I was concerned that the raw product, unused xylene that Lincoln had stored might be mixed with the non-hazardous paint sludge to get rid of it. This is why I made reference to this disposal in the report.

4. A photo of the contaminated area is included. As stated in paragraph three (3), page three (3) of the report, "the area was located outside, at the southwest end of the property, between the tool and die building and a chain link fence that surrounds the property." The Titon Tube facility is located along the south side of the Lincoln property. The oil stain area is between the two facilities.

During the inspection, I only observed one spill area. The drums that you saw stacked two (2) high were most likely at the receiving dock. The receiving dock is at the southeast end of the Lincoln property. These drums would have contained raw product. Since I only observed one spill area, only one clean-up was required.

The oil in the drums was manifested off-site in a tank truck. The drums were sold for metal recycling.

In the past, Lincoln had used dumpsters to move the oil. The handling was done outside, at the southwest of the property. The oil is now handled indoors and the dumpsters are no longer used to move the oil. My observation during the Lincoln inspection substantiates the claim by Titon Tube that the stain in the alleyway was caused by Lincoln.

5. The Personnel Training Plan violation is addressed in Unsatisfactory Feature #5, in the Comments section, paragraph 7, and Recommendation #5 of the report.

If the analysis of the cutting oil indicates that the oil is a hazardous waste regulated in 10 CSR 25-3 through 10 CSR 25-9. I recommend that a reinspection of Lincoln be completed.

MS/cc



Peoria Disposal Company

6320 E. Sterling Avenue • Peoria, IL 61616 (309) 696-0700

WASTE MATERIAL DATA SHEET

08208

GENERAL INFORMATION	GENERATOR NAME LINCOLN - ST. LOUIS																														
	FACILITY ADDRESS #1 LINCOLN WAY																														
	CITY, STATE, ZIP ST. LOUIS, MO. 63120																														
	CONTACT ROY LONG	PHONE (314) 679-4200																													
WASTE INFORMATION	WASTE NAME ZINC PLATING WASTE	USEPA# MOD006269385																													
	PROCESS DESCRIPTION ZINC PLATING ON CARBON STEEL (TREATMENT OF WASTEWATERS)	IEPA# 9291895658																													
	ANNUAL VOLUME 100 YARDS	BIC CODE N/A																													
	<input type="checkbox"/> BOX <input type="checkbox"/> DRUMS <input type="checkbox"/> TANKER <input checked="" type="checkbox"/> BAGS																														
ANALYTICAL DATA	PH 9.6	DENSITY 1160 LB/YD³																													
	TOTAL CYANIDE 0.52 mg/kg	REACTIVE CYANIDE — mg/kg																													
	FLASH POINT > 200 °F	% TOTAL SOLIDS 18																													
	TOTAL SULFIDE < 0.65 mg/kg	REACTIVE SULFIDE — mg/kg																													
	PAINT FILTER PASS	LOAD BEARING CAPACITY TON/FT²																													
	TOTAL PHENOL 2.5 mg/kg	TOTAL CHLORINE ppm																													
	REID VAPOR PRESSURE PSI	B & W %																													
	T.O.C. PPM	E.O.X. < 20 PPM																													
	ADDITIONAL																														
	ORGANICS																														
<table border="1"> <thead> <tr> <th></th> <th>TOTAL</th> <th>E.P. TOXICITY</th> </tr> </thead> <tbody> <tr> <td>ARSENIC (As)</td> <td>< 0.6</td> <td></td> </tr> <tr> <td>BARIUM (Ba)</td> <td>< 25</td> <td></td> </tr> <tr> <td>CADMIUM (Cd)</td> <td>53</td> <td>0.70</td> </tr> <tr> <td>CHROMIUM (Cr)</td> <td>780</td> <td>0.17</td> </tr> <tr> <td>LEAD (Pb)</td> <td>19</td> <td>< 0.1</td> </tr> <tr> <td>MERCURY (Hg)</td> <td>0.14</td> <td></td> </tr> <tr> <td>SELENIUM (Se)</td> <td>< 0.5</td> <td></td> </tr> <tr> <td>SILVER (Ag)</td> <td>< 1.3</td> <td>< 0.05</td> </tr> <tr> <td>CHROMIUM (Cr)</td> <td></td> <td>< 0.05</td> </tr> </tbody> </table>			TOTAL	E.P. TOXICITY	ARSENIC (As)	< 0.6		BARIUM (Ba)	< 25		CADMIUM (Cd)	53	0.70	CHROMIUM (Cr)	780	0.17	LEAD (Pb)	19	< 0.1	MERCURY (Hg)	0.14		SELENIUM (Se)	< 0.5		SILVER (Ag)	< 1.3	< 0.05	CHROMIUM (Cr)		< 0.05
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IS THIS A HAZARDOUS WASTE AS DEFINED IN 40 CFR 261? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YES, INDICATE E.P.A. HAZARDOUS WASTE # NON-HAZARDOUS																															
IS THIS A POLLUTION CONTROL WASTE AS DEFINED IN 35 IL. ADM. CODE 858? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO																															
COMPOSITIONAL DATA	<table border="1"> <thead> <tr> <th>COMPONENT NAME</th> <th>%</th> <th>COMPONENT NAME</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>WATER AS MOISTURE</td> <td>50</td> <td>MISC. METAL HYDROXIDES (i.e. Mg, Fe, etc.)</td> <td>2.5</td> </tr> <tr> <td>CALCIUM HYDROXIDE (POZZALINE)</td> <td>29</td> <td>MISC. DEBRIS (i.e. DIRT, METAL, PLASTIC, PAPER, ETC.)</td> <td>1</td> </tr> <tr> <td>ZINC PHOSPHATE</td> <td>17.5</td> <td></td> <td></td> </tr> </tbody> </table>		COMPONENT NAME	%	COMPONENT NAME	%	WATER AS MOISTURE	50	MISC. METAL HYDROXIDES (i.e. Mg, Fe, etc.)	2.5	CALCIUM HYDROXIDE (POZZALINE)	29	MISC. DEBRIS (i.e. DIRT, METAL, PLASTIC, PAPER, ETC.)	1	ZINC PHOSPHATE	17.5															
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HAZARDOUS MATERIAL DESCRIPTION (SEE 40 CFR 172.101) NON-HAZARDOUS SPECIAL WASTE																															
HAZARD CLASS N/A																															
IN PLANT DIRECTIONS ON FILE																															
RECEIVED N/A OCT 6 1989 WASTE MANAGEMENT PROGRAM MISSOURI DEPARTMENT OF																															
THE UNDERSIGNED HEREBY STATES THAT HE/SHE IS AUTHORIZED TO SIGN THIS DOCUMENT ON BEHALF OF THE GENERATOR, AND THAT TO THE BEST OF HIS/HER KNOWLEDGE THE INFORMATION SET FORTH ABOVE IS TRUE AND CORRECT.																															
ROY LONG NAME OF AUTHORIZED REPRESENTATIVE																															
X Roy Long SIGNATURE																															
12-8-88 DATE																															
FOR PEORIA DISPOSAL COMPANY USE ONLY																															
FORM# 2	PERMIT# 851027																														
AUTHORIZATION F	METH. FAC 04-26-PDC																														
ID# 695	EXPIRATION 1/11/94																														
SPECIAL CONDITIONS 851028																															
DRIVE TIME (ONE WAY) 3 1/2 HR	IN PLANT TIME 1 HR																														
APPROVED BY PREVIOUSLY REC'D WAC ON 10/2/88, SEE WMS 00300																															
DATE																															

MARKETING COPY



Illinois Environmental Protection Agency • P.O. Box 19276, Springfield, IL 62794-9276

217/782-6762

NOVEMBER 06, 1988
APPLICATION RECEIVED: 09/23/88
PERMIT NUMBER: 050739-1938160002
PERMIT CLASS: 1938160002

Agency authority to license non-hazardous waste disposal is hereby granted.

1. There shall be no discharge of hazardous waste into the environment by the permittee.

2. The permittee shall not discharge any waste into the environment.

WASTE NAME: NON-HAZARDOUS PAINT SLUDGE
WASTE CLASS: NON-HAZARDOUS

PERMIT TO RECEIVE THE INDICATED WASTE IS GRANTED.

SITE NAME: PEORIA CITY/COUNTY LANDFILL

DISPOSITION OF WASTE: 25

BULK OR CONTAINERIZED MIXED WITH DAILY REFUSE

WASTE TREATMENT:

STORAGE:

ATTENTION: ROY LONG

WASTE GENERATOR: LINCOLN-ST LOUIS CO

63120

THIS PERMIT IS GRANTED SUBJECT TO THE ATTACHED STANDARD CONDITIONS AND ANY SPECIAL CONDITIONS LISTED BELOW.

Any special conditions listed below shall be subject to the same terms and conditions as the standard conditions.

1. The permittee shall not accept the waste unless it is properly identified and labeled.

2. The permittee shall not accept the waste unless it is properly stored and managed.

3. The permittee shall not accept the waste unless it is properly disposed of.

4. The permittee shall not accept the waste unless it is properly tracked and reported.

5. The permittee shall not accept the waste unless it is properly managed and disposed of.

WASTE STREAM NUMBER: 050739

PERMIT EXPIRES: 11/03/91

PEORIA PUBLIC WORKS

63120

PEORIA CITY/COUNTY LANDFILL

63120

PEORIA CITY/COUNTY LANDFILL

63120

PEORIA CITY/COUNTY LANDFILL

63120

PEORIA CITY/COUNTY LANDFILL

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Peoria Disposal Company

4100 E. Sterling Avenue • Peoria, IL 61615 (309) 698-0700

WASTE MATERIAL DATA SHEET

06229

				GENERATOR NAME LINCOLN - ST. LOUIS CO.		
				FACILITY ADDRESS #1 LINCOLN WAY		
				CITY, STATE, ZIP ST. LOUIS, MO. 63120		
				CONTACT ROY LONG		
WASTE NAME NON-HAZARDOUS PAINT SLUDGE				USEPA MOD006269385	EPAS 9291895658	PHONE (314) 679-4200
PROCESS DESCRIPTION PAINTING OF FABRICATED METAL PARTS				ANNUAL VOLUME 80 YARDS		SIC CODE N/A
PH 6.0	DENSITY 1900 LB/YD³	FLASH POINT > 200 °F	% TOTAL SOLIDS 54	PAINT FILTER RECEIVED		LOAD BEARING CAPACITY TON/FT²
TOTAL CYANIDE 0.18 mg/kg	REACTIVE CYANIDE — mg/kg	TOTAL SULFIDE < 1.0 mg/kg	REACTIVE SULFIDE — mg/kg	TOTAL PHENOL 1.8 mg/kg		TOTAL CHLORINE ppm
RED VAPOR PRESSURE PSI	B.S. & W. %	TOC PPM	EOX 66 PPM	ADDITIONAL		
ORGANICS						
TOTAL		E. P. TOXICITY		TOTAL		E. P. TOXICITY
ARSENIC (As)				ENDRIN		
BARIUM (Ba)				LINDANE		
CADMIUM (Cd)				METHOXYCHLOR		
CHROMIUM (Cr)				TOXAPHENE		
LEAD (Pb)				2, 4D		
MERCURY (Hg)				2, 4, 5 SILVEX		
SELENIUM (Se)						
SILVER (Ag)						
IS THIS A HAZARDOUS WASTE AS DEFINED IN 40 CFR 261? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO						
IF YES, INDICATE EPA HAZARDOUS WASTE #						
NON-HAZARDOUS						
IS THIS A POLLUTION CONTROL WASTE AS DEFINED IN 35 IL. ADM. CODE 858? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO						
COMPONENT NAME		%		COMPONENT NAME		%
WATER AS MOISTURE		46		MISC. DEBRIS (i.e. WOOD, PAPER, PLASTIC, RUBBER, ETC.)		5
HARDENERS, PIGMENTS, AND RESINS		30		RECEIVED		
LIME		19				
HAZARDOUS MATERIAL DESCRIPTION (SEE 40 CFR 172.101): NON-HAZARDOUS SPECIAL WASTE				OCT 6 1989		
HAZARD CLASS N/A				UNIFORM HAZARD MANAGEMENT PROGRAM MISSOURI DEPARTMENT OF NATURAL RESOURCES N/A		
IN PLANT DIRECTIONS ON FILE						
THE UNDERSIGNED HEREBY STATES THAT HE/SHE IS AUTHORIZED TO SIGN THIS DOCUMENT ON BEHALF OF THE GENERATOR, AND THAT TO THE BEST OF HIS/HER KNOWLEDGE THE INFORMATION SET FORTH ABOVE IS TRUE AND CORRECT.						
SIGNATURE ROY LONG				SIGNATURE FROM GENERATOR ON FILE - REG # 150 C		
FOR PEORIA DISPOSAL COMPANY USE ONLY						
RG# 2	PERMIT# 850739	AUTHORIZATION N	METH FAC 01-25-CCY	ID# 150 C	EXPIRATION 11/3/91	
SPECIAL CONDITIONS						
DRIVE TIME (ONE WAY) 3 1/2 HR		IN PLANT TIME 1 HR		APPROVED BY PREPARED BY: R.D. WAB ON 8/12/85 - SEC 44MOS		DATE # 00312

MARKETING COPY

Illinois Environmental Protection Agency

MANIFEST

11/12/1984

Permit Number:

Standard Conditions

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) grants the Environmental Protection Agency authority to impose conditions on permits which it issues.

1. There shall be no deviations from the approved specifications unless a written request for modification of the permit is submitted to the Agency and approved.
2. Waste described in this permit must be accompanied by a manifest when transported except where exempt.
3. This permit is issued subject to all other regulations applicable to the permittee herein.
4. Hazardous waste, upon disposal, is subject to a fee in an amount as specified in the Environmental Protection Act. If the permittee is disposing of hazardous waste, he shall comply with Ill. Rev. Stat., 1980, Sec. 1022.2(b), as amended from time to time, and with the procedures adopted by the Agency in furtherance of such statutory provision and as set forth in a document entitled "Procedures for Operation of a Hazardous Waste Disposal Fee System," as published in 4 Illinois Register 774 (September 12, 1980).
5. The permittee shall allow any agent duly authorized by the Agency upon presentation of credentials:
 - a. to enter at reasonable times, the permittee's premises where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit.
 - b. to have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit.
 - c. to inspect at reasonable times, including during any hours of operation of equipment constructed or operated under this permit, such equipment or monitoring methodology or equipment required to be kept, used, operated, calibrated and maintained under this permit.
 - d. to obtain and remove at reasonable times samples of any discharge or emission of pollutants.
 - e. to enter at reasonable times and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring, or recording any activity, discharge, or emission authorized by this permit.

1. to enter or inspect at reasonable times, the permittee's premises for any other lawful purpose under the Environmental Protection Act.

6. Standard Condition No. 5 shall not constitute a waiver of any constitutional right of the permittee.
 7. These standard conditions shall prevail unless modified by special conditions.
 8. This Agency reserves the right to require installation of additional monitoring devices, to alter the selection of parameters to be analyzed and to alter monitoring frequencies as may be necessary to fulfill the intent of the Environmental Protection Act.
 9. This permit may be modified or revised to make the permit compatible with applicable Amendments to the Illinois Environmental Protection Act, new or amended Illinois Pollution Control Board Rules and Regulations, Regulations promulgated by the United States Environmental Protection Agency pursuant to the Resource Conservation and Recovery Act of 1976, as amended (RCRA) or Amendments to RCRA. Such modification or revision shall become part of this permit on the effective date of the Rule, Regulation or Amendment. The Agency will notify the permittee of such modification or revision.
- This standard condition shall not prejudice the permittee's right to obtain or be granted a reasonable time in which to comply, but in no event shall such time be later than any applicable Federal or State of Illinois statutory or regulatory compliance date, in connection with any modification or revision made pursuant thereto.
10. In accordance with Rule 302(A) of Illinois Pollution Control Board Rules and Regulations, Chapter 9: Special Waste Hauling Regulations (Chapter 9), the permittee shall not accept the special waste described herein for treatment, storage or disposal from any person unless that person has a valid special waste hauling permit issued by the Agency under Part II of Chapter 9, and concurrently presents to the permittee, or his agent, a completed, signed manifest as required by Part V of Chapter 9, which designates the permittee's facility as the destination for the special waste.

REGIONAL PLANNING DIVISION OF LAND POLLUTION CONTROL
COLUMBIANA, LOUIS CO
PERMIT NUMBER 11/18/85

PERMIT IS GRANTED SUBJECT TO THE ATTACHED STANDARD CONDITIONS AND
AFTER RECEIPT AT THIS SITE, BUT PRIOR TO DISPOSAL, THE HAZARDOUS WASTE
MAY BE TREATED BY THE HAZARDOUS WASTE TREATMENT UNIT.

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EXPIRED PERMITS



2200 Churchill Road, Springfield, IL 62706

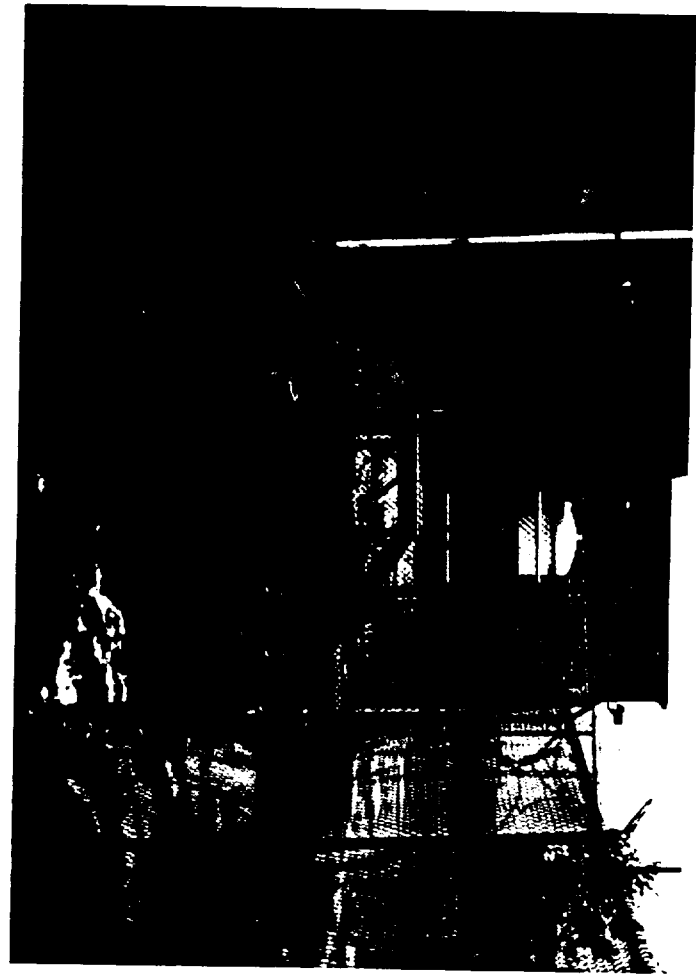
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[illegible]

LINCOLN CORP
5-31-89
MS

OIL SPILL AREA ON
SOUTHEAST END OF LINCOLN PROPERTY.
TITAN TUBE FACILITY IS TO
THE RIGHT OF PHOTO

971-18



27.085 Lincoln St. Louis
01105

JOHN ASHCROFT
Governor

G. TRACY MEHAN III
Director



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks, Recreation,
and Historic Preservation

DIVISION OF ENVIRONMENTAL QUALITY

June 16, 1989

St. Louis Regional Office
8460 Watson Road, Suite 217
St. Louis, MO 63119
314-849-1313

Mr. Roy Long, Plant Engineer
Lincoln St. Louis
One Lincoln Way
St. Louis, MO 63120

RECEIVED
JUN 23 1989

WASTE MANAGEMENT
PROGRAM

Dear Mr. Long:

L.O.W. #89-SL.045

Enclosed, please find a report of an inspection I conducted on May 25 & 31, 1989. The section titled "UNSATISFACTORY FEATURES" lists violations noted during the inspection. The "RECOMMENDATIONS" outline the steps that will correct those violations.

To document that corrective actions have been taken, you are requested to submit a written response no later than July 21, 1989. The response should describe the steps taken to correct each of the unsatisfactory features identified. Please direct the response to my attention. You should also forward a copy of your response and supporting documentation to Ms. Sandra Carrol, Chief - Hazardous Waste Enforcement, Waste Management Program, P.O. Box 176, Jefferson City, MO 65102.

It is our purpose by this letter to persuade you to take all necessary actions to comply with the Missouri Hazardous Waste Management Law. Failure to achieve timely resolution of violations may result in the referral of this case for enforcement action by the Waste Management Program.

Should you have any questions, or wish to confer in this matter, please contact me.

Sincerely,

DEPARTMENT OF NATURAL RESOURCES

Mike Struckhoff

Mike Struckhoff
Chief, Waste Management Unit
St. Louis Regional Office

MS/be

Enclosure

✓cc: Central Office, Waste Management Program

HAZARDOUS WASTE COMPLIANCE INSPECTION REPORT

FACILITY

Lincoln St. Louis - McNeil Corp.
One Lincoln Way
St. Louis, MO 63120
314-679-4370

MO Gen I.D. #: 01105
EPA I.D. #MOD006269385

INTRODUCTION:

An inspection of Lincoln St. Louis - McNeil corporation was conducted on May 25 & 31, 1989, to assess compliance with the applicable rules and regulations of the Resource Conservation & Recovery Act and the Missouri Hazardous Waste Management law. Mr. Mike Struckhoff, Environmental Specialist, MO Department of Natural Resources, St. Louis Regional Office (SLRO) conducted the inspection. Mr. Roy Long, Plant Engineer, represented the facility.

Lincoln manufactures a variety of lubrication equipment. This equipment includes grease gun parts and grease fittings for cars and machines. The facility receives metal castings and machines the castings into the desired products. Manufacturing processes include tool and die work, plating, heat treating, and some painting.

The facility generates approximately 20,000 pounds per month of waste cutting oil from the tool and die machines. The oil has chloride added to the oil by the supplier. Lincoln uses a manifest and ships the oil off-site as a hazardous waste. The oil is taken to Clayton Chemical, Sauget, Illinois, and is burned for resource recovery.

Lincoln also generates paint sludge from the painting lines and zinc plating waste from the plating line. The facility uses a manifest to document each shipment of these wastes. Both wastes, however, are managed as non-hazardous waste. Permits were issued to the Peoria Disposal Company, Peoria, Illinois, by the Illinois Environmental Protection Agency to dispose of these wastes from Lincoln at the Peoria City/County Landfill, Brimfield, Illinois. Copies of these permits and waste analyses are attached.

UNSATISFACTORY FEATURES

The Federal Regulations cited below are incorporated by reference in 10 CSR 25-5.262:

1. Incorrect use of a manifest document number and no MO Transporter ID number on manifests, in violation of 10 CSR 25-5.262(2)(B).
2. Manifests did not have alternate directions for delivery in violation of 40 CFR 262.20(d).
3. Placards were not available for use by transporters in violation of 40 CFR 262.33.

4. The facility did not have a contingency plan in violation of 40 CFR 265.51.
5. The facility did not conduct and document hazardous waste training in violation of 40 CFR 265.16.
6. Waste oil was disposed of into the environment in violation of 10 CSR 25.11.010(1)(D).
7. No device capable of summoning emergency assistance and no spill control materials were available at the storage area in violation of 40 CFR 265.32.

COMMENTS:

On May 25, 1989, during the first inspection visit to Lincoln, a hazardous waste records review and a facility tour was conducted. On May 31, copies of the analysis and permit for disposal of the non-hazardous waste were obtained. A closing meeting was also conducted to review violations observed during the inspection.

A manifest dated February 26, 1988, for a one time generation of PCB's used the incorrect manifest document number B198E. The manifest document numbers for all other manifests were correct.

The manifests did not include a MO transporter I.D. number. The facility should obtain this number from the transporter and include it on future manifests.

Not all the manifests included alternate directions for delivery in case the waste could not be delivered to the designated facility. This information should be included on all future manifests.

The facility did not have placards available at the facility for use by the transporter. Placards should be obtained and kept at the facility for use by the transporter.

Lincoln had not developed a contingency plan for the facility. The facility should develop a plan meeting the requirements outlined in 40 CFR 265.52 and 265.53. Send a copy of this plan to the St. Louis Regional Office and the Waste Management Program (WMP), in Jefferson City.

Lincoln had not conducted nor document hazardous waste personnel training. The training needed and personnel who require this training are outlined in 40 CFR 265.16. Send a copy of the training given and personnel who received training to the SLRO and the WMP.

As stated in the introduction, Lincoln ships waste oil off site as a hazardous waste. The facility used the EPA waste code F001 to identify this waste. No analysis of the oil had been obtained to determine if this is the proper waste code and what regulations govern its handling and disposal. Except for the chloride additive the only other material that may be present in the waste oil appears to be mineral spirits. Lincoln used mineral spirits to clean the tool and die machines.

The Missouri Hazardous and Solid Waste Laws and Regulations define waste oil has a hazardous waste. However, if the oil is not mixed with other hazardous waste it's handling and disposal can be managed under the requirements of 10 CSR 25.11. Mixtures of oil and other hazardous waste must be managed and disposed of under 10 CSR 25-3 through 10 CSR 25-9. The Federal Register / Vol. 50, No. 230 (attached) outlines when waste oil is required to be handled under the latter requirements.

In order to determine the proper management and disposal of the waste oil, Lincoln should have the oil analyzed for total halogens and for the characteristic of ignitability. Provide copies of these analyses to the SLRO and the WMP.

During the facility tour an area of oil contaminated soil and gravel was observed. The area was located outside at the southwest end of the property between the tool and die building and a chainlink fence that surrounds the property. Mr. Long stated that in the past, waste oil had been handled in this area. The contamination was the result of oil spilled during this handling. the handling of waste oil has since been moved indoors. No drums or tanks containing oil were present at this area during the inspection.

Lincoln should submit a clean-up plan for review to the SLRO. The plan should include analysis of the contaminated area to determine the proper handling and disposal of the waste. The analysis should also establish the depth and surface area of the contamination.

A tour of the storage area revealed that a device capable of summoning emergency assistance and spill control materials were not available in the area. Spill control materials were present at the other locations in the facility.

No hazardous waste was stored in the storage area. However, two, fifty-five gallon drums of raw product, labeled xylene, were observed. Mr. Long stated that the xylene was left from some years ago and no new xylene was being purchased. This product would be used to clean paint equipment. You are advised that this spent cleaning solvent would be a hazardous waste, waste code F003, and should not be mixed with the nonhazardous paint sludge. Land disposal restrictions would apply to this waste.

RECOMMENDATIONS:

1. Use the correct manifest documents numbers and include MO transporter ID numbers on future manifests.
2. Include alternate directions for delivery of waste on future manifests.
3. Obtain placards and make them available for use by transporters.
4. Develop a contingency plan and send copies of the plan to local emergency response facilities. Send copies to the SLRO and the WMP.
5. Conduct and document hazardous waste training. Send copies of the training given and individuals who received the training to the SLRO and the WMP.
6. Install a device in the storage area capable of summoning emergency assistance. Locate spill control material at the storage area.

7. Submit a clean-up plan for the oil contaminated soil. Upon approval, dispose of this soil at the proper facility.
8. Obtain a waste analysis for the waste cutting oil and provide this information to the SLRO and the WMP.
9. Certify that the xylene waste cleaning solvent will not be mixed with the non-hazardous waste sludge. Ship this waste via a manifest to an authorized TSD or resource recovery facility.

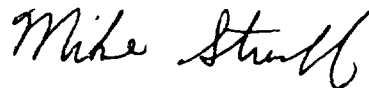
Should you have any questions regarding this report, please contact the St. Louis Regional Office.

APPROVED



F. Donald Maddox
Regional Administrator
St. Louis Regional Office

PREPARED BY:



Mike Struckhoff
Environmental Specialist
Hazardous Waste Management Unit
St. Louis Regional Office

FDM/MS/be

Enclosure

cc: Central Office, WMP

LARGE QUANTITY GENERATOR CHECKLIST

Form LQG-INSP
(10-15-88)Name of Facility: Lincoln St LouisDate: MayAddress: One Lincoln Way
St Louis Mo 63120

Other Inspections Done:

RR _____ TRANS _____ LDR _____
OTHER NONEPhone: (314) 679-4370 MO ID# 01105EPA ID# MO D006269385Facility Representative: Roy LongTitle: Plant Engineer

Briefly describe manufacturing process(es). (Use continuation sheet, if needed.)

Lincoln manufactures a variety of lubrication equipment. Manufacturing processes include tool & dye work, plating and heat treating, and painting of some products.

List of wastes generated. (Use continuation sheet, if needed.)

	Waste	Amount/Month	Disposition	
1.	Cutting Oil with additives	approx. 20,000 lb	Clayton Chemical	Burned for Recovery
2.	Non-Hazardous Paint Sludge		Peoria City / County Landfill	Landfill
3.	Non-Hazardous Zinc Plating Waste		Brimfield Ill.	Landfill
4.	PCB Waste	6 Transformers one time generation	Peoria City / County Landfill	Landfill
5.			America Environmental Service	Disposition unknown

A. MANIFESTS AND RECORDKEEPING 10 CSR 25-5.262(2) AND 5.262(2)(B) AND (D)

Generator's MO and EPA I.D. Numbers. (✓)

Manifest document number (MO I.D. & Shipment #). (✓)

EPA Waste I.D. codes (✓) ?

Generator's name, address, phone # (✓)

All Transporters' names, phone #'s, MO and EPA I.D. #'s (✓)

Designated facility name, address, phone # and MO and EPA I.D. # (✓)

Proper DOT Shipping Name, Hazard Class and I.D. # (✓)

Containers, Quantity and Unit Wt/Vol being shipped properly designated (✓)

Proper certification including waste minimization. (✓)

Manifest properly signed and dated (✓)

No more than 10 days time between generator and facility signatures. (✓)

Manifests returned within 35 days. (✓)

If not, exception generator report submitted within 45 days. (✓)

Completed manifests and Summary Manifest Report and Certification. (✓)

Spills of reportable quantities reported to DNR. (✓)

B. PRETRANSPORT, CONTAINERIZATION AND LABELING 10 CSR 25-5.262(2) AND 5.262(2)(C)1

Waste Packaged, marked and labeled per DOT during entire on-site storage period and prior to transport. (✓) ?

Placards available for use by transporters (✓)

Satellite accumulation requirements met (if applicable). (✓)

a. Stored in satellite areas less than 1 year. (✓)

b. Containers marked identifying contents and beginning date (✓)

c. Containers kept closed/compatible/good condition. (✓)

d. Quantities accumulated not exceeding 55 gal. (1 qt. acutely hazardous waste). (✓)

C. STORAGE STANDARDS 10 CSR 25-5.262(2) AND 5.262(2)(C)2 AND 3

Facility inspected and maintained. (✓)

Date of accumulation marked. (✓)

Storage less than 90 days (unless small quantity generator). (✓)

D. CONTAINER STORAGE 10 CSR 25-5.262(2) AND 5.262(2)(C)2

Containers in good condition (✓)

Containers kept closed in storage. (✓)

Containers storing incompatible waste separated or protected from each other. (✓)

Containers of ignitable or reactive waste stored > 50 feet from property line (✓)

Containers stored within a containment system (if applicable) meeting criteria of 10 CSR 25-5.262(2)(C)2.B. (✓)

E. STORAGE TANKS 10 CSR 25-5.262(2) AND 5.262(2)(C)2.C.
(See tank checklist)

F. PERSONNEL TRAINING 10 CSR 25-5.262(2)

Documentation of hazardous waste director's qualifications or training. ☒
Completed classroom or on-the-job training. ☒
Job title, description, and name of person filling position ☒
Written record of the type and amount of training given ☒
Documentation confirming that training has been given ☒

G. PREPAREDNESS AND PREVENTION 10 CSR 25-5.262(2) AND 5.262(2)(C)2.E.

Internal communication or alarm system. ☒
Device in the hazardous waste operation area capable of summoning emergency assistance. ☒
Fire control, spill control, and decontamination equipment available. ☒
Adequate water supply for fire control equipment. ☒
Adequate and proper safety equipment available. ☒
Adequate aisle space. ☒
Arrangements with local emergency agencies. ☒

H. CONTINGENCY PLAN AND EMERGENCY PROCEDURES 10 CSR 25-5.262(2)

Contingency Plan. ☒
Detailed description of procedures that personnel must implement to respond to fires, explosions, or releases of hazardous waste. ☒
Describe formal arrangements with emergency agencies. ☒
Name, addresses, and phone numbers (home & office) of emergency coordinators. ☒
Emergency equipment including its description and location. ☒
Evacuation plan if applicable ☒

I. WASTE OIL 10 CSR 25-11.010

Written waste oil contract maintained ☒
Waste oil properly stored and transported ☒

COMMENTS:

Inspector Signature & Title: Mike Struckhoff Environmental Specialist

Office: St. Louis Regional Office

IN COMPLIANCE

☒

IN VIOLATION OR
ABSENT

☐